

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHRISTOPER MANHART,

Plaintiff,

v.

AJP EDUCATION FOUNDATION, d/b/a/  
AMERICAN MUSLIMS FOR PALESTINE,  
WESPAC FOUNDATION, INC.,  
STUDENTS FOR JUSTICE IN PALESTINE,  
DISSENTERS,  
EDUCATION FOR A JUST PEACE IN  
THE MIDDLE EAST, d/b/a US  
CAMPAIGN FOR PALESTINIAN RIGHTS,  
JEWISH VOICE FOR PEACE,  
TIDES CENTER, d/b/a COMMUNITY  
JUSTICE EXCHANGE,  
JINAN CHEHADE,  
SUPERIOR MURPHY,  
RIFQA FALANEH, and  
SIMONE TUCKER,

Defendants.

No. 24-cv-8209

**Declaration of Neville Hedley**

I, Neville S. Hedley, declare as follows:

1. I have personal knowledge of the facts set forth herein and that the Exhibits to this Declaration are true and accurate copies of internet sites and social media accounts that I personally accessed and viewed, and, if called as a witness, could and would testify competently thereto.

2. My full legal name is Neville Spencer Hedley. I reside in North Carolina and my business address is Hamilton Lincoln Law Institute, 1629 K Street, NW, Suite 300, Washington, DC, 20006. My email address is [ned.hedley@hlli.org](mailto:ned.hedley@hlli.org). I am also licensed to practice in Illinois and I am a member of the Northern District of Illinois Trial Bar. My colleague M. Frank Bednarz works at the

Chicago office of the Hamilton Lincoln Law Institute, which has a business address of 1440 W. Taylor St. # 1487, Chicago, IL 60607.

### **IRS EXEMPT ORGANIZATIONS FILE**

3. On or about June 26, 2024, I searched the Internal Revenue Service website, [www.IRS.gov](http://www.IRS.gov), which contains an Exempt Organization Business Master File Extract (EO BMF); [www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-extract-eo-bmf](http://www.IRS.gov/charities-non-profits/exempt-organizations-business-master-file-extract-eo-bmf). The file “provides information about an organization from the Internal Revenue Service’s Business Master File.” This list functions as a Tax-Exempt Organization Search tool.

4. The tax-exempt organization list is broken out by state and by region. The regions are: Region 1 Northeast area; Region 2, mid-Atlantic and Great Lakes area; Region 3, Gulf Coast and Pacific Coast areas; and Region 4, including International areas and Puerto Rico.

5. States and Regions are determined by the filing address and represent the location of an organization’s headquarters. The records are also sorted by the Employee Identification Number (EIN).

6. The version of the Tax-Exempt Organization Search tool I reviewed noted that it had been updated on February 13, 2024.

7. Each State or Region exempt organization list can be downloaded into an Excel spreadsheet from the tool on the IRS website.

8. The Internal Revenue Service permits organizations that are exempt under Internal Revenue Code (I.R.C.) Section 501(c)(3) to sponsor other organizations, entities, or programs that are not formal legal, nonprofit entities. It is a contractual relationship between the sponsoring tax-exempt organization and the entity or program being sponsored, thereby allowing the latter to obtain tax deductible donations without having to formally become a tax-exempt organization. The sponsoring entity maintains control over the donated funds, but such funds are restricted and dedicated to furthering the sponsored entity’s purpose and goals. *See* Gene Takagi, *Fiscal Sponsorship: A Balanced Overview*, Nonprofit Quarterly (Jan. 28, 2020). (Exhibit 1)

9. WESPAC Foundation maintains a website, [www.wespac.org](http://www.wespac.org). WESPAC Foundation describes itself as “a leading force for progressive social change in Westchester County, New York since 1974” and that it has “been educating, agitating and organizing for a more just and peaceful world, an end to militarism and racism and a more fair economy that works for all.” (Exhibit 2)

10. The bottom of the webpage lists the address of the WESPAC Foundation as 77 Tarrytown Rd., White Plains, NY 10607. (Exhibit 2 at 8)

11. WESPAC Foundation, Inc., is a tax-exempt organization under I.R.C. § 501(c)(3). During the relevant time, WESPAC Foundation acted as the fiscal sponsor and served as the formal legal entity for tax-exempt donations for affiliates such as National Students for Justice in Palestine (NSJP or SJJP) and similar organizations such as the Palestinian Youth Movement (PYM) and the US Palestinian Community Network (USPCN).

12. WESPAC acted as the fiscal sponsor for NSJP during the relevant time, and has promoted NSJP events on through its own social media accounts. *See, e.g.* [www.instagram.com/p/CzKAX7ZRzsv/](https://www.instagram.com/p/CzKAX7ZRzsv/). (Exhibit 3) WESPAC’s Executive Director, Nada Khader, admitted in a press interview that WESPAC served as the fiscal sponsor for NSJP. [www.algemeiner.com/2016/11/03/mysterious-westchester-foundation-collects-cash-for-this-weekends-national-campus-bds-convention/](http://www.algemeiner.com/2016/11/03/mysterious-westchester-foundation-collects-cash-for-this-weekends-national-campus-bds-convention/) (Exhibit 4)

13. NSJP is an unincorporated association with no formal principal place of business or publicly disclosed leadership structure. On information and belief, NSJP is directed by a national steering committee. An article in *The New Yorker* magazine from 2023 profiled the organization and identified two individuals, Carrie Zaremba and Sean Eren, as members of the steering committee. *See* Emma Green, *How A Student Group Is Politicizing A Generation On Palestine*, THE NEW YORKER (Dec. 15, 2023). A post on NSJP’s X account dated September 2, 2024 also referenced Zaremba as a steering committee member.. (Exhibit 5) A graduate student in California, Dylan Kupsh, identified himself as an NSJP steering committee member in union campaign materials, [www.rnfdy.org/dylan](http://www.rnfdy.org/dylan). (Exhibit 6)

14. A search for WESPAC Foundation on the exempt organization list for New York State shows that WESPAC Foundation, Inc., is an exempt organization under Internal Revenue Code

(I.R.C.) Section 501(c)(3), and the address on file with the IRS is 77 Tarrytown Road, Suite 2W, White Plains, NY 10607.

15. Jewish Voice for Peace (JVP) maintains a website, [www.jewishvoiceforpeace.org](http://www.jewishvoiceforpeace.org). The website includes a web page for donations and includes an EIN 90-0018359 and an address of P.O. Box 589, Berkeley, California, 94701. (Exhibit 7)

16. A search for JVP on the exempt organization list for California shows that Jewish Voice for Peace, Inc., is an exempt organization under I.R.C. Section 501(c)(3), and the address on file with the IRS is 2418 High Street, Apartment 5, Oakland, California, 94601-4886, and an EIN of 90-0018359, the same EIN as listed on the JVP website.

17. Dissenters maintains a website, [www.wearedissenters.org](http://www.wearedissenters.org). A search for Dissenters on the IRS exempt organization list for Region 2, which includes Illinois, shows that Dissenters is an exempt organization under I.R.C. Section 501(c)(3), and the address on file with the IRS is 637 South Dearborn Avenue, Chicago, Illinois, 60505, and an EIN of 83-1394763.

18. Tides Center maintains a website, [www.tides.org](http://www.tides.org). The Tides Center sponsors and financially supports several projects, including the Community Justice Exchange. The Community Justice Exchange (CJE) has a website, [www.communityjusticeexchange.org](http://www.communityjusticeexchange.org), which has a web page for donations. That web page states that CJE is a nonprofit 501(c)(3) project of the Tides Center and lists an EIN of 94-3213100. It also states that donations by check to support CJE may be mailed to Tides Center, P.O. Box 889385, Los Angeles, California 90088-9385. (Exhibit 8)

19. The Tides Center website includes a web page related to non-profit disclosures, which contains links to IRS Form 990s for the Tides Center, and states that the primary mailing address is 1012 Torney Avenue, San Francisco, California, 94129. The Form 990 for 2022 for the Tides Center reflects the same address and EIN 94-3213100, which is the same as listed on the CJE website. (Exhibit 9)

20. A search for Tides Center on the IRS exempt organization list for California reflects that Tides Center is an exempt organization under I.R.C. Section 501(c)(3), and shows the same EIN and address as referenced in ¶ 19.

21. US Campaign for Palestinian Rights (USCPR) maintains a website, [www.uscpr.org](http://www.uscpr.org), which includes links to IRS Form 990s for the organization. The Form 990s show that the name of the organization is Education for Just Peace in the Middle East, and that it does business as US Campaign for Palestinian Rights. It lists the address as P.O. Box 3609, Washington, DC 20027, and its EIN as 42-1636592. (Exhibit 10)

22. USCPR's website includes a page to make donations, including a link to make donations by mail. The address provided is the same as above and includes the EIN 42-1636592. (Exhibit 11)

23. A search of the IRS's exempt organization list for Region 2, which includes Washington, DC, lists Education for Just Peace in the Middle East as an exempt organization under I.R.C. § 501(c)(3) with an address of 1628 16th Street, NW, Washington, DC, 20009-3064 and reflects the same EIN as in ¶¶ 21 and 22.

24. Americans for Justice in Palestine (AMP) has a website, [www.ampalastine.org](http://www.ampalastine.org). The webpage has a link to a donation page which notes that donations are directed to AJP Educational Foundation (AJP) which is the fiscal sponsor for AMP. (Exhibit 12)

25. AJP is a 501(c)(3) non-profit corporation incorporated in California with its principal place of business in Falls Church, Virigina. According to the donation web page for AMP/AJP, AJP's EIN is 27-1365284. A search of the IRS's tax exempt organization database for Region 2 has a listing for AJP with the above referenced EIN and an address of 6404 Seven Corners Place, Suite N, Falls Church, VA 22044-2034, which is the address listed at the bottom of the AMP donation webpage.

#### **A15ACTION WEBSITE, TIDES CENTER/CJE AND SOCIAL MEDIA**

26. Based on internet searches and media reports, I learned that there was an informal organization calling itself A15 Action. A15 Action maintains a website, [www.a15action.com](http://www.a15action.com), which states that the objective of the organization was a "Coordinated Economic Blockade to Free Palestine." (Exhibit 13)

27. An internet search indicates that the A15 Action website was registered on March 22, 2024 at squarespace.com. (Exhibit 14)

28. The A15 Action website includes a proposal which states that the purpose of the organization was “to coordinate a multi-city economic blockade on April 15th in solidarity with Palestine.” The stated purpose was to block “the arteries of capitalism and jam[] the wheels of production.” The proposal further stated that participating individuals and organizations would “identify and blockade major choke points in the economy, focusing on points of production and circulation with the aim of causing the most economic impact.” (Exhibits 13)

29. The proposal on the A15 Action website continued by stating that the goal of the planned action for April 15, 2024 was to “cause pain to the economy” and “to disrupt and blockade economic logistical hubs and the flow of capital.” (Exhibit 13)

30. The A15 Action website also included a reference to “Anti-Repression Resources” one of which was a “U.S. Bail & Legal Defense Fund.” (Exhibit 13) The website included a link to donate in advance to a bail fund in the event that activists were charged with criminal conduct. The donation tab on the website linked (and still links) to an ActBlue donation page, [secure.actblue.com/donate/a15solidarity](https://secure.actblue.com/donate/a15solidarity). However, the page currently states that “This fundraiser is not currently accepting any donations,” but notes that the fundraiser is Community Justice Exchange and has a link to a website, [www.communityjusticeexchange.org/nbfn-directory/](https://www.communityjusticeexchange.org/nbfn-directory/). (Exhibit 15) An archived version of the page taken on April 17, 2024 indicates that donations went “to the Community Justice Exchange, a project of Tides Center.” [archive.ph/czvZV](https://archive.ph/czvZV) (Exhibit 16)

31. Act Blue LLC, also known as ActBlue Civics, Inc., is a tax-exempt entity under I.R.C. § 501(c)(4) and is a registered Political Action Committee.

32. The ActBlue website referenced in ¶ 30 allowed individuals to donate to support the A15 Bail & Legal Defense Fund and specified that the donation would be for the benefit of the Community Justice Exchange. The web page noted that ActBlue Charities is a tax-exempt entity under I.R.C. § 501(c)(3). (Exhibit 16)

33. The A15 Action website listed regional and local contacts, stating that “[d]ue to the sensitive nature of this action, some folks organizing for April 15th prefer to remain anonymous, or embedded solely within their existing communities.” The website goes on to list email addresses

and/or Instagram links for connecting with the organizers of the actions in the different cities. The contact for the Chicago action is listed as [A15Chicago@proton.me](mailto:A15Chicago@proton.me). (Exhibit 17)

34. A15 Action also maintains an account on the social media platform X, [www.x.com/a15action](https://www.x.com/a15action), with a username of @A15action. The A15 Action website has an X (formerly Twitter) icon that links to this account. (Exhibit 13) On April 13, 2024, that X account published a post with text stating “[d]onate here to support community members who are criminalized in the U.S. for their solidarity with Palestine,” and included a link to the donation page for CJE referenced in ¶ 30. The post included a picture with text stating “Coordinated Economic Blockade to Free Palestine United States Bail & Legal Defense Fund.” [x.com/a15action/status/1779188080768852054](https://x.com/a15action/status/1779188080768852054) (Exhibit 18)

35. On May 13, 2024, the same @a15action X account reposted an item from the X account of Cocktails & Capitalism. The post included text stating “Recognizing the global economy’s complicity in genocide, folks in 82 cities & 19 countries blockaded economic choke points on April 15th.” The post included a video with narration and included video clips of activists blockading Interstate 190 (I-190) as it enters O’Hare International Airport and narrator noted that three international airports were blockaded that day. (Exhibit 19)

36. A15 Action maintains an Instagram account, [www.instagram.com/a15actions/](https://www.instagram.com/a15actions/) with a username @a15action. The A15 Action website has an Instagram icon that links to this Instagram account. (Exhibit 13) The Instagram account contains several posts, many in collaboration with other Instagram accounts, dated April 15, 2024 highlighting the blockade of traffic on I-190 at the entrance of O’Hare International Airport. The posts include videos and pictures of activists blockading traffic with traffic in the background at a standstill. (Exhibit 20) Subsequently, on July 19, the Instagram account for A15 Action posted in collaboration with @wearedissenters, @chicagodissenters, and @sjpchicago, among others, posted “A Letter to Mayor Brandon Johnson From the O’Hare 40” urging the city to drop charges against those arrested for blocking traffic to the airport. [www.instagram.com/p/C9nk-HsvcPQ/](https://www.instagram.com/p/C9nk-HsvcPQ/) (Exhibit 21) And on July 29, the Instagram account for A15 Action posted another collaboration with @chicagodissenters and @sjpchicago, a graphic that reads

“The Ohare 40 Need Your Support at Court,” which asked readers to “Join us and send a message to the City” regarding a routine status call for the 40 people arrested on April 15 for their blockade. [www.instagram.com/p/C-Bf59bvPRM/](https://www.instagram.com/p/C-Bf59bvPRM/) (Exhibit 22)

37. The @a15action Instagram account also has posts dated April 10 and 15, 2024 promoting the bail fund referenced in ¶ 30 with links to the CJE donation web page. The post on April 15, 2024 has text stating “Support A15 Arrestees In The United States.” (Exhibit 23) Also on April 15, 2024, A15 Action used its Instagram account to publish a joint post with @directactions4palestine and @uscpr a post that showed a picture of activists blocking traffic on <sup>1190</sup> and asking supporters to call the Chicago Police Department and demand the release of the 40 activists were arrested for participating in the blockade of O’Hare airport. The post included the hashtag “#A15Action.” [www.instagram.com/p/C5y5mdDSxsI/](https://www.instagram.com/p/C5y5mdDSxsI/) (Exhibit 24)

### **SJP, AMP AND WESPAC FOUNDATION**

38. National Students for Justice in Palestine (“NSJP” of “SJP”) is a student organization that according to its website, [nationalsjp.org/about](https://nationalsjp.org/about), states that its purpose is “to empower, unify, and support student organizers as they push forward the demands for Palestinian Liberation & self-determination on their campuses.” (Exhibit 25)

39. In 2010, at a conference for the pro-Palestinian Boycott, Divestment and Sanctions movement, AMP established National SJP as an umbrella organization for the various SJP chapter spread across the country. *See* archived page for Students for Justice in Palestine National Convention 2010 [web.archive.org/web/20111221040517/http://ussf.palestineconference.org/sjp-national-conference/](https://web.archive.org/web/20111221040517/http://ussf.palestineconference.org/sjp-national-conference/) (Exhibit 26) AMP has continued to direct the actions of SJP student groups. [www.ampalestine.org/about-amp/faqs](https://www.ampalestine.org/about-amp/faqs) (Exhibit 27) This includes using Instagram, in collaboration with defendants USCPR and NJSP, to promote a general strike on April 15, 2024 as part of the A15 Action campaign. [www.instagram.com/p/C5ZvInUAL8O/](https://www.instagram.com/p/C5ZvInUAL8O/) (Exhibit 28) The U.S. Congress Committee on Oversight and Accountability also has asserted that SJP was founded and is controlled by AMP ([oversight.house.gov/wp-content/uploads/2024/05/Letter-to-National-SJP-5.29.24.pdf](https://oversight.house.gov/wp-content/uploads/2024/05/Letter-to-National-SJP-5.29.24.pdf)).

40. The NSJP website, at the time of the April 15, 2024 action, had a link to a web page to make donations. That webpage noted that all donations are tax deductible and allowed individuals who donate by credit card to elect to cover the transaction fee so more of donation went directly to WESPAC Foundation, Inc., which acted as SJP's financial sponsor. *See* archive of donation page from July 1, 2024. [web.archive.org/web/20240701005742/https://nationalsjp.org/donate](https://web.archive.org/web/20240701005742/https://nationalsjp.org/donate). (Exhibit 29) SJP removed the donation link on its website sometime after June 2024 following Congressional investigations related to SJP and AMP.

41. SJP maintains an account on Instagram, [www.instagram.com/nationalsjp/](https://www.instagram.com/nationalsjp/), with a username of @nationalsjp, and the SJP website has icon that links to this Instagram account. SJP also has an account on the social media platform X, [www.x.com/NationalSJP](https://www.x.com/NationalSJP), with a username @NationalSJP.

42. SJP has multiple chapters at college campuses across the United States. It has one or more Chicago affiliates active on campuses at Northwestern University, the University of Chicago, DePaul University and the School of the Art Institute. (Exhibit 30)<sup>1</sup>

43. The Chicago affiliate of SJP has an Instagram account, [www.instagram.com/sjpchicago/](https://www.instagram.com/sjpchicago/), and a username of @chicagosjp, which states that it is “[a] unified front of Chicagoland SJPs, supporting and uplifting on another in the struggle for Palestinian liberation.” (Exhibit 31)

44. On April 15, 2024 the Instagram account for the Chicago affiliate of SJP published a joint post with the Instagram accounts @palestineactivismcollective, @a15actions, and @uscpr, that showed pictures and a video of activists blockading traffic on I-190 at the entrance of O'Hare International Airport and included text stating the activists were “uniting and blocking access to O'Hare.” One of the pictures in the post showed a traffic map indicating that traffic was backed up

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<sup>1</sup> National SJP recently changed its homepage to remove the map of “Popular University for Gaza Solidarity Encampments.” This image was taken from a prior version of the page, e.g. [archive.ph/BYJiA](https://archive.ph/BYJiA).

as far as Interstate 90 and Interstate 294 and the feeder ramps from those highways into I-190 into O'Hare. (Exhibit 20)

45. Also on April 15, 2024, the same Instagram account, along with the Instagram accounts @chicagodissenters, @wearedissenters, @a15actions, and @directactions4palestine, published a post with two slides. The first slide showed a picture of activists sitting on I-190, linked together blocking traffic with a caption reading "BREAKING: CHICAGOANS JOIN GLOBAL ECONOMIC BLOCKADE TO FREE PALESTINE. MONDAY APRIL 15 TAX DAY CHICAGO, O'HARE INTERNATIONAL AIRPORT." The second slide included a video showing approximately 16 activists linked together using PVC piping blocking traffic and surrounded by activists chanting slogans. The video showed that traffic was blocked behind the activists. The text accompanying the video stated "HAPPENING NOW Chicagoans are BLOCKING the ENTRANCE to O'Hare International Airport, baring flyers from accessing Terminals 1-3. On this Tax Day, when millions are paying taxes which fund the ongoing US and Israeli bombardment of Gaza, protestors seek to take dramatic action, alongside other @a15actions organizers worldwide." (Exhibit 32)

46. The same SJP Instagram account, along with the same four accounts referenced in ¶ 41 posted on April 15, 2024, a video of activists blockading traffic on I-190 and travelers being forced to walk from their stopped vehicles towards to terminals. The text accompanying the post stated "HAPPENING NOW Travelers are walking to their gates as drivers are prevented from entering the drop-off site for all domestic terminals at O'Hare, stopping travelers from reaching their flights." (Exhibit 33)

47. On April 16, 2024, the Instagram account of SJP's Chicago affiliate, along with the Instagram accounts @chicagodissenters, @wearedissenters, @boeingarmsgenocide, @a15actions, and @directactions4palestine, published a post with six separate slides. The first slide contained a video of activists blockading traffic on I-190 at the entrance of O'Hare and included a caption stating "On Tax Day, Chicagoans took part in a worldwide economic blockade to free Palestine, known as

A15, blocking I-190 highway entrance to O'Hare International Airport for 1 hour and 20 minutes resulting in 40 arrests.” (Exhibit 34)

48. The remaining slides on the April 16, 2024 post described that O'Hare was selected as a target of the A15 Action because (1) O'Hare is a major international airport; and (2) Boeing Corporation was headquartered in Chicago and O'Hare serves as a hub for two major U.S. airlines, United Airline and American Airlines, both of which are major customers of Boeing. The post continued by noting that Boeing was a target because it is a weapons manufacturer and supplies armaments to the Israeli Defense Forces that are used by the Israeli military in acts in Gaza and Lebanon. (Exhibit 34)

49. A story by the Associated Press about the illegal blockade at O'Hare identified Rifqa Falaneh as one of the organizers of the blockade, who stated that the action was part of a global “economic blockade to free Palestine.” [apnews.com/article/protests-chicago-ohare-palestinian-war-traffic-30da0602309a1645a5c59e10bce83b9c](https://apnews.com/article/protests-chicago-ohare-palestinian-war-traffic-30da0602309a1645a5c59e10bce83b9c). (Exhibit 35)

50. Falaneh is the Michael Ratner Justice Fellow at the public interest at the public interest law firm Palestine Legal, which is sponsored by Tides Center. According to her biography on the Palestine Legal website, [palestinelegal.org/staff](https://palestinelegal.org/staff), Falaneh had been president of SJP's affiliate at DePaul University in Chicago and helped establish the Chicago affiliate of SJP in 2019. (Exhibit 36)

51. Jinan Chehade is an activist who helped organize the April 15, 2024 blockade at O'Hare and was one of 40 activists arrested. Chehade posted a picture of her being arrested on April 15, 2024 to her Instagram account. (Exhibit 37) Chehade is an attorney with the Muslim Legal Fund of American, [mlfa.org/teams/jinan-chehade/](https://mlfa.org/teams/jinan-chehade/), and a graduate of Georgetown University Law School where she was the co-founder of the SJP chapter. (Exhibit 38)

### **JVP AND RELATED SOCIAL MEDIA ACCOUNTS**

52. Jewish Voice for Peace (JVP) maintains a website, [www.jewishvoiceforpeace.org](https://www.jewishvoiceforpeace.org), where it describes itself as “the largest progressive Jewish anti-Zionist organization in the world.” (Exhibit 39)

53. JVP maintains an account on X, [www.x.com/jvplive](https://www.x.com/jvplive), with a username of @jvplive, and an account on Instagram, [www.instagram.com/jewishvoiceforpeace/](https://www.instagram.com/jewishvoiceforpeace/), with a username of @jewishvoiceforpeace. The JVP website has icons that link directly to these social media accounts.

54. The JVP website includes a map showing local chapters. One of the chapters listed is Chicago, [www.jewishvoiceforpeace.org/join-us/#local](https://www.jewishvoiceforpeace.org/join-us/#local). (Exhibit 40)

55. JVP's Chicago chapter maintains a website, [www.jvpchicago.org](https://www.jvpchicago.org), and also has an account, and an account on Instagram, [www.instagram.com/jvpchicago/](https://www.instagram.com/jvpchicago/), with a username of @jvpchicago, and the website has an icon that links directly to this account. JVP Chicago also has an account on X, [www.x.com/JVPChicago](https://www.x.com/JVPChicago), with a username @JVPChicago. (Exhibit 41)

56. On April 15, 2024, JVP's Chicago chapter used its Instagram account to publish a post that contained two videos and 4 slides with pictures. One video shows approximately 16 activists linked together with PVC piping blocking inbound traffic to O'Hare on I-190 along with several other activists assisting those linked together while chanting slogans. The other video shows dozens of travelers on foot with luggage by-passing the activists to make their way to the terminals. The slides are pictures of activists blocking traffic and a headline and text from a Chicago Tribune news story which identifies Rifqa Falaneh as one of the blockade organizers. The text accompanying the Instagram post states "As part of the #A15ForPalestine international day of action, protestors shut down traffic into three O'Hare international airport terminals for two hours this morning! No business as usual during a genocide!" The text accompanying the post references the Instagram accounts @chicagodissenters, @sjpchicago, @a15actions, and @directactions4palestine. (Exhibit 42)

57. A media report regarding the O'Hare blockade from WLS, the ABC affiliate in Chicago, quoted an activist, Defendant Simone Tucker, stating "Enough is enough. The U.S. government has given us no choice but to disrupt business as usual." (Exhibit 43)

58. The LinkedIn profile for Simone Pass Tucker indicates that she is a Student Organizer for JVP in Chicago, Illinois. [www.linkedin.com/in/simone-pass-tucker/](https://www.linkedin.com/in/simone-pass-tucker/) (Exhibit 44)

59. JVP's website includes a page dedicated to an action organized by JVP to shut down Grand Central Station in New York City on October 27, 2023;

[www.jewishvoiceforpeace.org/2023/10/30/wire-grand-centralaction/](http://www.jewishvoiceforpeace.org/2023/10/30/wire-grand-centralaction/). The page highlights that the group “shut down Grand Central Station” during a Friday rush hour, completing shutting down the station. The page also notes that over 350 people were arrested.

60. JVP’s website also includes a page highlighting that JVP organized actions in eight different cities where activists shut down eight bridges to traffic; [www.jewishvoiceforpeace.org/2023/12/18/wire-8-bridges/](http://www.jewishvoiceforpeace.org/2023/12/18/wire-8-bridges/). The blockades coincided with the eighth night of Hanukkah and noted that thousands of activists blocked traffic in Philadelphia, Washington, D.C., Atlanta, Chicago, Minneapolis, Seattle, Portland, Los Angeles, and San Diego.

### **DISSENTERS AND SOCIAL MEDIA ACCOUNTS**

61. Dissenters maintains a website, [www.wearedissenters.org](http://www.wearedissenters.org), and describes itself as “leading a new generation of young people to reclaim our resources from the war industry, reinvest in life-giving services, and repair collaborative relationships with the earth and people around the world.” (Exhibit 45)

62. Dissenters maintains an account on X, [www.x.com/wearedissenters](https://www.x.com/wearedissenters), with a username of @wearedissenters, and also has an Instagram account, [www.instagram.com/wearedissenters/](https://www.instagram.com/wearedissenters/), with a username @wearedissenters. The wearedissenters.org website has icons that link directly to these respective social media accounts. (Exhibit 45)

63. Dissenters is headquartered in Chicago and has a chapter in Chicago which maintains an Instagram account, [www.instagram.com/chicagodissenters/](https://www.instagram.com/chicagodissenters/), with a username @chicagodissenters.

64. On April 15, 2024, Dissenters posted on its X account, @wearedissenters, several posts related specifically to the O’Hare blockade. One of the posts has been pinned at the lead post on its X account. The posts included pictures and videos of the blockade of traffic on I-190 at the entrance of O’Hare and the post that was pinned included text stating “BREAKING: Organizers are blockading the road entering O’Hare Airport in Chicago!! !! NO business as usual while the US green lights the genocide of Palestinians.” [x.com/wearedissenters/status/1779857163806023936](https://x.com/wearedissenters/status/1779857163806023936) (Exhibit 46)

65. A post on April 16, 2024 from the same X account provided an update on activists arrested during the O'Hare blockade stating "UPDATE: All 40 protesters arrested have been released." (Exhibit 47)

66. On April 15, 2024, the Instagram account for @chicagodissenters published several posts related to the O'Hare blockade, one of which is pinned as lead items on its Instagram page. Several of the posts were done in collaboration with the Instagram accounts @wearedissenters, @sjpchicago, @a15actions, and @directactions4palestine, and @boeingarmsgenocide, an Instagram account affiliated with @wearedissenters.

67. The pinned post from April 15, 2024, shows the activists blocking traffic while travelers are walking around the blockade to get to the terminals. The text accompanying the post states "HAPPENING NOW Travelers are walking to their gates as drivers are prevented from entering the drop-off site for all domestic terminals 1-3 at O'Hare, stopping travelers from reaching their flights. ON THIS TAX DAY, THERE WILL BE NO BUSINESS AS USUAL WHILE GAZANS ARE DYING." (Exhibit 33)

68. One of the April 15, 2024 posts has two slides, the first of which includes a picture of activists sitting on I-190 linked together with PVC piping blockading traffic at the entrance of O'Hare. The picture has a caption that reads "BREAKING: CHICAGOANS JOIN GLOBAL ECONOMIC BLOCKADE TO FREE PALESTINE MONDAY, APRIL 15 | TAX DAY CHICAGO, O'HARE INTERNATIONAL AIRPORT." The post includes text that states "HAPPENING NOW Chicagoans are BLOCKING the ENTRANCE to O'Hare International Airport, barring flyers from accessing Terminals 1-3. On this Tax Day, when millions are paying taxes which fund the ongoing US and Israeli bombardment of Gaza, protestors seek to take dramatic action, alongside other @a15actions organizers worldwide." The second slide includes a video showing approximately 16 activists linked together by PVC piping blocking I-190 along with other activists assisting them and chanting slogans. A long line of stopped traffic can be seen in the background. (Exhibit 20).

69. Another post from @chicagodissenters on April 15, 2024, includes a video with Defendant Superior Murphy on camera narrating that activists are blockading traffic at O'Hare airport

with video capturing activists blocking traffic and touting that the blockade was part of a global movement. (Exhibit 20)

70. On April 16, 2024, the @chicagodissenters Instagram account published a post in collaboration with @directactions4palestine, @sjpchicago, and @a15actions highlighting that all 40 activists arrested during the O'Hare blockade had been released. (Exhibit 48)

71. Also on April 16, 2024, the @chicagodissenters Instagram account in collaboration with @sjpchicago, @wearedissenters, @boeingarmsgenocide, @a15actions, and @directactions4palestine published a post with six slides. This post is also pinned at the top of @chicagodissenters Instagram account. The first slide includes a video showing the activists linked together with PVC piping sitting on I-190 blocking traffic with fellow activists surrounding them and chanting slogans with stopped traffic in the background. The caption accompanying the post stated "On Tax Day, Chicagoans took part in a worldwide economic blockade to free Palestine, known as A15, blocking the I-190 highway entrance to O'Hare International Airport for 1 hour and 20 minutes resulting in 40 arrests. Drivers were blocked from entering the drop-off site for all domestic terminals 1-3 at O'Hare, preventing travelers from reaching their flights. Banners dropped at sites across the city, coincided with the action." (Exhibit 34) The other five slides in the April 16, 2024, post explained that O'Hare was targeted because it is one of the busiest airports in the nation, and because it serves as a hub for United and American Airlines, both of which are major clients of Boeing. The post explained that Boeing was targeted because it manufactures weapons systems and armaments that are used by Israel in Gaza and Lebanon. (Exhibit 34)

72. Dissenters has continued to collaborate with A15 Action after the April 15 blockade. For example, on July 7, the Instagram account for A15 Action posted in collaboration with @wearedissenters and @chicagodissenters, among others, a video of activists who had chained themselves to a fence in order to delay the NASCAR race that occurred in Chicago that day. [www.instagram.com/p/C9Iw0OcPFSj/](https://www.instagram.com/p/C9Iw0OcPFSj/) (Exhibit 49) Arrest records suggest that Dissenters' listed principal officer, Timothy Rose, was arrested on this date at 1100 S. Lake Shore Drive, which appears consistent with site depicted in the video posted by A15 Action.

## USCPR AND SOCIAL MEDIA ACCOUNTS

73. USCPR's website states that it is the "political home for all who believe that freedom for the Palestinian people is an integral part of achieving our collective liberation." (Exhibit 50)

74. USCPR maintains an Instagram account, [www.instagram.com/uscpr](https://www.instagram.com/uscpr) with a username of @uscpr. It also maintains an X account, [www.x.com/uscpr](https://www.x.com/uscpr), with a username @uscpr\_. The USCPR website has icons that link directly to these two social media accounts. (Exhibit 50)

75. On April 11, 2024, the @uscpr Instagram account posted a flyer promoting a #Strike4Gaza with text stating "On this upcoming Tax Day, Monday, April 15 join the #Strike4Gaza. [www.instagram.com/p/C5ok53eszqM/](https://www.instagram.com/p/C5ok53eszqM/) On April 15, 2025, the same Instagram account posted a similar flyer promoting the #Strike4Gaza and noting that "protesting & disrupting" was one of the ways to participate. [www.instagram.com/p/C5yKHwPM9Mz/?hl=en&img\\_index=5](https://www.instagram.com/p/C5yKHwPM9Mz/?hl=en&img_index=5) (Exhibit 51)

76. On April 15, 2024, USCPR's Instagram account, @uscpr, in collaboration with the Instagram accounts @sjpchicago, @a15actions, and @palestineactivsimcollective, posted five pictures and a video that showed activists blockading traffic and a traffic map showing traffic on highways leading into O'Hare backed up. The text accompanying the post stated "Chicagoans and neighbors are uniting and blocking access to O'Hare! When our tax dollars are being used to fund the genocide of Palestinians we take actions—especially on Tax Day! No justice, no peace!" (Exhibit 20)

77. Later, on April 15, 2024, USCPR used its Instagram account @uscpr to publish a joint post with @directactions4palestine and @a15actions a post that showed a picture of activists blocking traffic on I-190 and asking supporters to call the Chicago Police Department and demand the release of the 40 activists were arrested for participating in the blockade of O'Hare airport. The post included the hashtag "#A15Action." (Exhibit 24)

78. Also on April 15, 2024, USCPR used its Instagram account @uscpr to publish a post advocating for individuals to "SUPPORT A15 ARRESTEES IN THE UNITED STATES" and directed them to "Donate at [bit.ly/a15fund](https://bit.ly/a15fund)." The post noted that the funds would be "used for bail, legal defense, and support for defendants." The post directed individuals to the CJE fund sponsored by the Tides Center. (Exhibit 52)

I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed on September 9, 2024, in Charlotte, North Carolina.

  
\_\_\_\_\_  
Neville Hedley

# EXHIBIT 1



## Fiscal Sponsorship: A Balanced Overview



*This article was first posted online on January 19, 2016.*

Fiscal sponsorship is an option that may be available to a person, group, or business to attract charitable funding without starting a nonprofit. It may allow an individual artist to fund the creation of a mural, a group to hold a crowdfunding campaign for pediatric cancer research, or a manufacturer to create and distribute products to regions devastated by a recent natural disaster.

When done right, fiscal sponsorship is a valuable alternative to starting a nonprofit that produces private and public efficiencies through shared administration and fewer nonprofits requiring fiduciary and regulatory oversight.

But when done wrong, fiscal sponsorship may result in an individual or for-profit company inappropriately deriving a private benefit from charitable contributions. This may occur when the fiscal sponsor acts as a mere conduit for contributions to flow to the individual or company without exercising the required control and oversight.

### A Definition

The term fiscal sponsorship broadly refers to a number of contractual relationships that allow a person, group, or business to advance charitable or other exempt activities with the benefit of the tax-exempt status of a sponsor organization. These relationships are cogently described in Greg Colvin's seminal book, *Fiscal Sponsorship: Six Ways to Do It Right*. The most widely used models of fiscal sponsorship for charitable projects are:

- Comprehensive (referred to by Colvin as "Model A"), in which the assets, liabilities, and exempt activities collectively referred to as the project are housed within the fiscal sponsor; and

- Pre-approved grant relationship (referred to by Colvin as “Model C”), in which the project is run by a separate entity funded by the fiscal sponsor.

## How Fiscal Sponsorship Works

Donations to fiscally sponsored projects are directed to a tax-exempt fiscal sponsor. Most commonly, the fiscal sponsor is a public charity exempt under Section 501(c)(3) of the Internal Revenue Code and a qualified recipient of charitable contributions that are deductible to the donor. The donations intended to support a particular project are treated as restricted funds dedicated to furthering that project’s charitable purpose.

The fiscal sponsor must then decide how to use those funds. It may not cede its ultimate control and decision-making authority over the funds to the project leaders. But the fiscal sponsor may delegate management of the funds to specific employees, contractors, or volunteers of the fiscal sponsor (comprehensive fiscal sponsorship). Alternatively, it may grant the funds to a suitable grantee that it vetted earlier (pre-approved grant relationship fiscal sponsorship).

### Comprehensive Fiscal Sponsorship

In the comprehensive model, the party entering into the fiscal sponsorship agreement with the fiscal sponsor is generally giving up all ownership and control of the project to the sponsor and retaining only the right to enforce, amend, or terminate the agreement and have the project transferred to another qualified fiscal sponsor. In contrast to the fiscal sponsor, the other party to the agreement is not a tax-exempt entity able to directly receive deductible charitable contributions and is likely not properly registered to solicit charitable funds or assets. Most often, it’s just some form of steering committee with minimal activity of its own, which helps minimize any risk that might otherwise be borne by its members.

When working on the fiscally sponsored project, the individuals associated with the other party to the agreement serve as employees, volunteers, or other agents of the fiscal sponsor. Accordingly, if they are fundraising for the project, they are fundraising on behalf of the fiscal sponsor as agents of the fiscal sponsor. Similarly, if they are managing the activities and affairs of the project, they are doing so as agents of the fiscal sponsor, which may afford them the protection of the sponsor’s insurance.

In the comprehensive model, the assets and liabilities of the project are the assets and liabilities of the fiscal sponsor. The fiscal sponsor takes on the project, and all of its risks, because it advances the sponsor’s own charitable mission. Typically, in light of all of the administrative burdens and costs associated with the project and to ensure its own organizational health, the fiscal sponsor charges an *intra-organizational* administrative fee to the restricted fund dedicated to the project’s charitable purposes.

A fiscal sponsor providing comprehensive sponsorship can serve as an effective and efficient vehicle for incubating a new charitable project, testing an innovative idea, implementing a program with a fixed time frame, and hosting a collaborative effort among charities or funders.

### Pre-Approved Grant Relationship

In the pre-approved grant relationship model, the party entering into the fiscal sponsorship agreement with the fiscal sponsor is the sponsor’s grantee. Unlike with the comprehensive model, the project is owned by the grantee, not by the fiscal sponsor. Accordingly, the project’s assets and liabilities belong to the grantee, which is responsible for its own tax and filing obligations.

Generally, the individuals associated with the grantee serve as agents of the grantee when working on the project. But when they are fundraising for the project, they are doing so as agents of the fiscal sponsor. The fundraising must be carried on by the fiscal sponsor because the grantee lacks the tax status to allow for deductible contributions or private foundation qualifying distributions.

The key to this model is to ensure the fiscal sponsor is not serving as a mere conduit for donors and foundations to direct contributions and grants to the fiscal sponsor’s grantee. While the fiscal sponsor can accept contributions and grants with a purpose restriction on how they are used, the fiscal sponsor must have ultimate discretion and control on whether to use such contributions and grants itself or re-grant them out to another entity, not limited to the grantee whose representatives may have raised such funds in the capacity as agents of the fiscal sponsor.

The intended grantee is vetted and pre-approved by the fiscal sponsor prior to any fundraising for the purposes of the project. So long as the grantee has not breached the fiscal sponsorship agreement, the fiscal sponsor will ordinarily grant the funds raised for the project to the grantee, less some agreed upon amount it retains as an administrative fee. While the fiscal sponsor has the variance power to direct such funds to another organization to advance the same charitable purposes, it has a business reason not to exercise such power except under egregious circumstances.

A fiscal sponsor providing pre-approved grant relationship fiscal sponsorship can facilitate broader grantmaking to individual artists producing works to be introduced to the public for noncommercial purposes, nonprofits without an IRS determination of 501(c)(3) status, and discrete charitable programs of for-profit social enterprises. Unlike the fiscal sponsor, such grantees may not be qualified recipients of deductible charitable contributions.

In addition, many, if not most, private foundations have internal rules prohibiting them from making grants to such grantees in part because complex tax laws require them to exercise certain due diligence procedures and threaten them with stiff penalties for a failure to properly comply. In contrast, a private foundation may more safely make a grant to a qualified fiscal sponsor so long as it does not require the sponsor to act as a mere conduit for its grants to flow to a non-exempt grantee.

### Fiscal Sponsorship Administration Fee

A portion of the funds raised to advance a particular project's purpose is typically retained by the fiscal sponsor as an administrative fee. But the fiscal sponsor must account for the significant administrative burdens and costs and the risks associated with acting as a fiscal sponsor to a project. For comprehensive fiscal sponsors, such burdens generally include the management and/or administration of charitable solicitations, donations, grants, human resources (including payroll and benefits), volunteers, financial reporting, audits, government filing requirements, and appropriate risk management tools (e.g., insurance, legal counsel).

In many cases, particularly with smaller projects, the costs associated with fiscally sponsoring a project are higher than the administrative fee. This may be acceptable so long as the fiscal sponsor believes that the project's value in advancing the sponsor's mission is worth such net expense. But regardless of whether the administrative fee covers the additional costs, the fiscal sponsor must provide proper management and oversight over the project.

### Where Things Go Wrong

Some nonprofits offer fiscal sponsorship as a means for generating additional revenue without adequately managing or overseeing their projects. In a comprehensive fiscal sponsorship, the fiscal sponsor should have the appropriate infrastructure and resources one would reasonably expect of the legal operator of the project. Consistent with such expectation, the fiscal sponsor's delegation of duties to the project leaders should follow only after sufficient due diligence of such individuals and their planned activities. Additionally, the fiscal sponsor should ensure it has appropriate policies to guide the project leaders' actions, maintain oversight of the operations, and protect the charitable assets.

Where a fiscal sponsor neglects its responsibilities, a project can be operated in a manner inconsistent with applicable laws and/or beyond the sponsor's capacity. This scenario can easily come back to haunt a fiscal sponsor and its leaders if the project's activities (1) result in an unexpected liability, like one stemming from a lawsuit, penalty, or fine; (2) trigger additional registration, licensing, or reporting requirements; (3) fall outside of the sponsor's stated purpose in its governing documents; or (4) attract significant negative publicity.

Oversight of a project's activities by regulators and, indirectly, by donors, also becomes more challenging if the sponsor consolidates all of its projects in its information returns and other reports. Accordingly, while the onus is on the fiscal sponsor to properly manage its comprehensively sponsored projects, the additional layer of protection against misuse of charitable assets can be compromised if the sponsor does not keep proper records and the project becomes "hidden" among all of its other projects.

A fiscal sponsor without sufficient capacity may also jeopardize the assets raised for each of its programs by misusing or misdirecting those assets to pay for its general administrative costs or other inappropriate expenses. *NPQ* has [previously covered such scenarios](#).

Accordingly, a project's founders seeking fiscal sponsorship should be as selective in choosing an appropriate fiscal sponsor as a fiscal sponsor is in choosing a project. But it would be a mistake to use a fiscal sponsor's administrative fee as the primary selection criteria. More important are the fiscal sponsor's financial health, key personnel, and understanding of its legal responsibilities as a fiscal sponsor. The National Network of Fiscal Sponsors' [guidelines](#) for both comprehensive and pre-approved grant relationship fiscal sponsorship are outstanding resources to help assess whether a fiscal sponsor's practices and agreements reflect such proper understanding.

## Conclusion

From a legal perspective, a comprehensively sponsored (Model A) project of a fiscal sponsor is generally no different from an internal program of any nonprofit with the exception of the rights the parties may have to transfer the program to another qualified successor nonprofit. And a pre-approved grantee of a fiscal sponsor housing the sponsored (Model C) project is generally no different from a grantee of any nonprofit that elects to grant funds to an individual or nonexempt entity, which is a permissible form of grantmaking for any charity so long as it is done with appropriate restrictions on use.

Fiscal sponsorship, when appropriately structured and implemented, is a valuable alternative to formation of a nonprofit organization, particularly where the sustainability of a separate entity is highly questionable, the charitable endeavor has a relatively short life span, or the project founders lack the capacity to properly administer a compliant nonprofit, tax-exempt organization. While there will always be stories of abuses, as is the case in every field, the problem lies in the implementation and not the lawful practice of fiscal sponsorship done right. Fiscal sponsors must be diligent in helping to educate the field and the broader community to preserve and best utilize this important and often misunderstood form of collaboration.

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### About the author



Gene Takagi

Gene Takagi is a Principal at NEO Law Group, contributing publisher of the Nonprofit La...

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# EXHIBIT 2



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# WESPAC

We have been a leading force for progressive social change in Westchester County, New York, since 1974. We have been educating, agitating and organizing for a more just and peaceful world, an end to militarism and racism and a more fair economy that works for all.

Welcome WESPAC



# Support Us With A Donation

DONATE

## Upcoming Events

SEP 4:30 pm - 6:30 pm

11

Cooking Up Community with Chef Green

SEP 7:00 pm - 8:30 pm

11

WESPAC Liberation Book Club

SEP 1:30 pm - 4:30 pm

15

We Refuse to Remain Enemies: Meet Israelis and Palestinians Who Are Still Working Together Symposium

SEP 6:00 pm

17

The Devil We Know Screening at Greenburgh Public Library

View Calendar

## The Latest

Membership Appeal 2024

Sep 4, 2024

Hello WESPACers! As we enter September, it is time for our annual Membership Appeal. You can find a digital copy of the appeal letter here. In our 50th year, we particularly reflect in gratitude on the support of this wonderful community. Thank you in advance for your...

[read more](#)

## WESPAC August 2024 Solidarity Newsletter

Aug 9, 2024

If you missed it in your inbox, here is this month's newsletter: WESPAC August 2024 Solidarity Newsletter!

[read more](#)

## Support University Students and the Struggle for Food Sovereignty!

Jun 4, 2024

WESPAC has had the pleasure of working with Sarah Lawrence College students over the last semester period. A couple of these students have created a community fridge in Yonkers for the Sarah Lawrence community. Learn more about it at the below links: Website:...

[read more](#)

## TOMORROW: Volunteers needed in Mount Vernon Garden

Aug 16, 2024

[read more](#)

## US Corporations Pump Aquifers Dry as Police Kill Water Defenders

Jul 30, 2024

Excellent (and lengthy) article about the devastating environmental and human effect of NAFTA and neoliberal policies on a community in Mexico. Persisting even under AMLO and possibly Sheinbaum... ..

[read more](#)

## Public Banking Act Support

Jun 4, 2024

This legislative session, New York has a historic opportunity to bring public banking to our state! After years of campaigning to pass the New York Public Banking Act we now have a chance to bring public banking to Rochester which would be the first public bank in the...

[read more](#)

## H2OO New Youth Cohort Application

Aug 16, 2024

Heirs To Our Ocean (H2OO) is recruiting youth aged 16–25 for the 5th Cohort of the U.S. Youth Action Council for the UN Ocean Decade (U.S. YAC UNOD). H2OO is an official UN Ocean Decade partner, and this Council is endorsed as a Decade Action in collaboration with the...

[read more](#)

## WESPAC June 2024 Solidarity Newsletter

Jun 12, 2024

If you missed it over email, check out the June 2024 Solidarity Newsletter!

[read more](#)

WESPAC Annual Awards! Sunday, June 2nd at 2pm in Rye, NY!

Apr 16, 2024

[read more](#)

[« Older Entries](#)

## WESPAC on Facebook



**Explore WESPAC**

1 week ago

This Wednesday, WESPAC is hosting Osama Iliwat and Rotem Levin for a conversation about Palestinian and Israeli peace activism. Please RSVP at [wespacfoundation@gmail.com](mailto:wespacfoundation@gmail.com), and read more above!



Photo

[View on Facebook](#) · [Share](#)



**Explore WESPAC**

2 weeks ago

This Wednesday, WESPAC is hosting Osama Iliwat and Rotem Levin for a conversation about Palestinian and Israeli peace activism. Please RSVP at [wespacfoundation@gmail.com](mailto:wespacfoundation@gmail.com), and read more below:



Photo

[View on Facebook](#) · [Share](#)



**Explore WESPAC**

2 weeks ago

The organizers are planning a nonviolent civil disobedience component. If you would like to participate in the civil disobedience, please let me know and I will connect you:



Photo

[View on Facebook](#) · [Share](#)



**Explore WESPAC**

1 month ago

Good morning, all,

I have checked with Lana and she is happy for me to share this write up about her and her family. Her father is from the ancient Christian Palestinian Shawa family in Gaza. They have lost 92 members of their extended family in Israel's bombing of Gaza. Lana was introduced to WESPAC after October 7th last year:

[www.greenwichtime.com/news/article/ct-greenwich-palestinian-american-1](http://www.greenwichtime.com/news/article/ct-greenwich-palestinian-american-1) ... See More

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**Explore WESPAC**

2 months ago



Photo

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Explore WESPAC

[Follow Page](#) 1.6K followers

## WESPAC on Twitter



**WESPAC Foundation**

[Follow](#)

WESPAC has been working for #peace & #socialjustice for 48 years. We work for a #progressive agenda for the planet & its peoples. wespacfoundation@gmail.com

↻ WESPAC Foundation Retweeted



**Frack Action** @frackaction · 22 Aug

"This new, experimental form of gas drilling is highly untested and poses a lot of the same threats to our air, water and communities as the conventional, high-volume hydraulic #fracking," Renee Vogelsang, NY Director at Frack Action @GovKathyHochul

💬 ↻ 7 ❤️ 9 Twitter

↻ WESPAC Foundation Retweeted



**UAW** @uaw · 22 Aug

If we want the war in Gaza to end, we can't put our heads in the sand or ignore the voices of the Palestinian Americans in the Democratic Party. If we want peace, if we want real democracy, and if we want to win this election, the Democratic Party must allow a Palestinian...

💬 ↻ 8212 ❤️ 30659 Twitter

↻ WESPAC Foundation Retweeted



**IfNotNow** 🔥🇺🇸 @ifnotnoworg · 22 Aug

"We have enough tears to cry for two peoples. Freedom for Palestinians does not put Jews in danger." -@Junesfinalrose

#LetPalestineSpeak #NotAnotherBomb

💬 ↻ 575 ❤️ 1668 Twitter



**WESPAC Foundation** @wespac\_ny · 22 Aug

The organizers are planning a nonviolent civil disobedience component. If you would like to participate in the civil disobedience, please let me know and I will connect you:

💬 ↻ 1 ❤️ 1 Twitter

↻ WESPAC Foundation Retweeted

**The Saviour** @stairwayto3dom · 20 Aug



THIS VIDEO IS THE REASON WHY THEY REMOVED BASSEM YOUSSEF'S ACCOUNT



20021 51313 Twitter

WESPAC Foundation Retweeted



**Dr Mohammed Al Najjar** **PS** @m7madnajar · 20 Aug



I haven't bathed with shampoo or soap for 4 months because they've blocked them from entering Gaza. We are slowly dying from infections. Death here doesn't come just from the bombs. This case one of thousand have severe skin disease without available treatment  
World must know

618 778 Twitter

WESPAC Foundation Retweeted



**Librarians and Archivists with Palestine** @librarians2pal · 20 Aug



Calling all citizen archivists! Check out these crowdsourced archival initiatives working to preserve Palestinian heritage, memory, and narratives, compiled by Librarians and Archivists with Palestine. (1/3)

269 403 Twitter

Load More

WESPAC Foundation

77 Tarrytown Rd.

White Plains, NY 10607


914-449-6514

wespacfoundation@gmail.com

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- Who We Are
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# EXHIBIT 3





**SAT. NOVEMBER 4, 2 PM - FREEDOM PLAZA**

# NATIONAL MARCH ON WASHINGTON FREE PALESTINE!

**BIDEN, NO MORE US AID TO ISRAEL! LIFT THE SIEGE ON GAZA NOW!  
THE PEOPLE DEMAND A CEASEFIRE!**


Logos: PALESTINIAN YOUTH MOVEMENT, حركة الشباب, U.S. PALESTINIAN COMMUNITARIAN NETWORK (USPCN), ANSWER, PALESTINE, THE PALESTINE RIGHT TO RETURN COALITION, Al-Awda, AMERICAN MUSLIM ALLIANCE, US CAMPAIGN FOR PALESTINIAN RIGHTS, National Students Justice Palestine, Palestinian Feminist Collective.





wespacfoundation • Follow




...




wespacfoundation 41w

We have chartered an additional bus leaving from North White Plains! Leaving for the National March on Washington for Palestinian Freedom this Saturday, Nov 4. The link to purchase a bus ticket is in the bio on our Instagram profile.

<https://www.eventbrite.com/e/two-buses-to-washington-dc-from-n-white-plains-tickets-748416633297?aff=oddtcreator>









51 likes

November 2, 2023

Add a comment...



More posts from wespacfoundation





**VIGIL 4 PALESTINE  
& COMMUNITY AID  
SPACE**

**6:00PM**

Tuesday August 6th  
Tuesday August 20th

Lincoln Memorial Park,  
Yonkers, NY 10705





JOIN THE  
**BEEHIVE  
COLLECTIVE**

FOR ART, STORYTELLING  
& DISCUSSION

@WESPAC  
77 Tarrytown Rd, White Plains NY

**\$5-\$10 Suggested Donation**  
No One Turned Away for Lack of Funds

**6/29**  
doors 5:30pm  
event 6:00pm

QR code and RSK logo

@BEEHIVEDESIGNCOLLECTIVE

33



# EXHIBIT 4

# the algemeiner

NOVEMBER 3, 2016 4:46 PM

## ‘Mysterious’ Westchester Foundation Collecting the Cash for This Weekend’s National Campus BDS Convention



by Ira Stoll



A WESPAC-sponsored protest in July against NY Gov. Cuomo, organized by the Freedom to Boycott Coalition. Photo: WESPAC website.

Hundreds of anti-Israel student activists will convene this weekend in Fairfax, Va., for the annual national Students for Justice in Palestine (SJP) Conference, hosted by George Mason University Students Against Israeli Apartheid.

But the bills for the three-day event will be paid by an entity that may surprise even many close followers of the movement to isolate Israel via boycotts, divestment and sanctions (BDS).

It's not a traditional Arab-American hotbed like Dearborn, Michigan, or even a left-wing anti-Israel campus bastion like Berkeley, Calif. Instead, it's a little-known foundation based in Westchester County, New York, a place known more for its golf courses and suburban synagogues than for hard-core anti-Zionist political agitation.

Click the "donate" [button](#) of the national SJP website, and you reach a page with a fundraising thermometer showing \$13,000 raised out of the \$20,000 goal "to ensure that we have a successful conference this year." A further click brings up a PayPal page that says, "Donate to WESPAC Foundation."

"We're the fiscal sponsor of it," the executive director of the WESPAC Foundation, Nada Khader, told *The Algemeiner* in a brief telephone interview this week. "It's aligned with our mission."

She clarified that her organization doesn't fund or donate to the conference from its own funds, but supports it with its organizational infrastructure by acting as a conduit for money the SJP raises and "managing the bookkeeping for the national conference," which she said that the progressive nonprofit tracks separately in its accounting software.

She said WESPAC has been serving in this role for "four or five years."

Over that period, the WESPAC's revenues have soared to \$677,548 in the year that ended in August 2014, from \$311,213 in the prior year and \$226,053 in the year before that. The numbers come from the foundation's three most recent publicly available tax returns.

Guidestar, a nonprofit watchdog and data site, using information supplied by WESPAC, lists the group's largest donor as the Elias Foundation, which says it "seeks to promote a more equitable and progressive society by supporting the development of emerging grassroots leaders."

Elias **reported** giving \$130,000 for "general operating funding supporting WESPAC's continuing growth and efforts to promote development of young leaders, peace and justice activism locally." Federal campaign finance records show the president of the Elias Foundation, Jacqueline Mann of Mount Kisco, NY, gave \$1017.16 to the 2016 presidential campaign of Democratic candidate Bernie Sanders.

The WESPAC website says, "Our members are currently involved with food justice work, anti-fracking/anti-nuclear and pro-safe energy, solidarity with Indigenous Peoples, an end to militarism and drone warfare and a just resolution to the Israel/Palestine conflict."

The group's website also openly **discloses** its support for BDS, declaring — in a section headed "militarism and foreign policy" — "WESPAC supports the call by over 200 Palestinian civil society organizations for punitive measures including boycotts, divestment, and sanctions to be maintained until Israel meets its obligation to recognize the Palestinian People's inalienable right to self-determination and fully complies with the precepts of international law."

Khader's bio **describes** her as a former Fulbright scholar in Tunisia, who also served as a consultant for the UN Development Program in the Gaza Strip.

The vice president of research at the Foundation for Defense of Democracies, Jonathan Schanzer, testified earlier this year before the House Foreign Affairs Committee about the "corporate and fiscal structure of the BDS campaign's major actors in the United States." Schanzer, who worked from 2004

to 2007 as a terrorism finance analyst for the Treasury Department, told *The Algemeiner* that the WESPAC Foundation “remains something of a black box.”

“They remain one of the more mysterious elements of the BDS network,” Schanzer said. “Nobody understands the role.”

SJP didn’t respond to *The Algemeiner*’s emailed questions about its sources of funding, the identity of its largest donors, or whether any of its funding came from overseas.

WESPAC’s Khader offered to forward our questions to the students, and we sent a query about “how these activities are funded, who the donors are, if any of them are foreign, how much money is involved.” We never heard back; if we do, we’ll post an update.

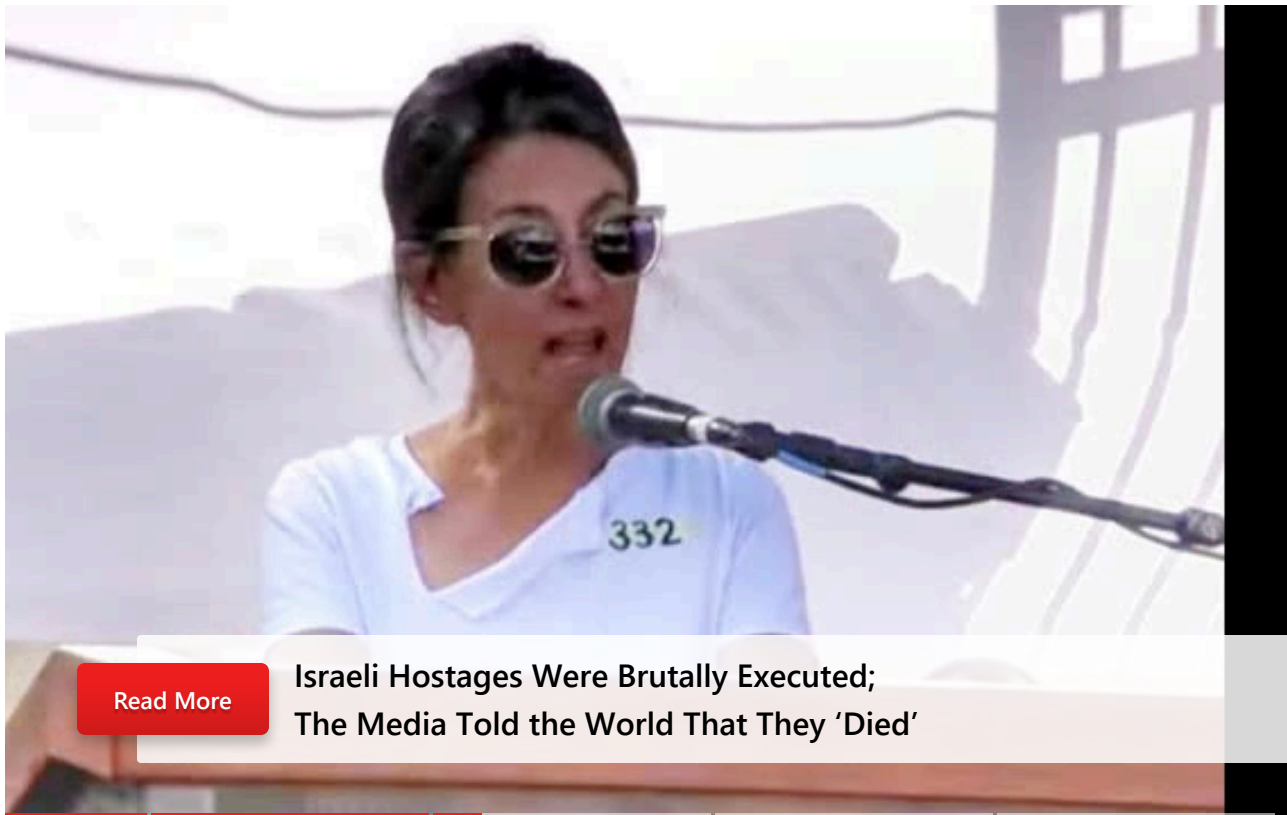
The surge of anti-Israel activity on campus has generated speculation about whether it’s being fueled by petrodollar potentates from overseas (who also might have an interest in fighting fracking or nuclear energy in the US, because it could undercut demand for imported oil). Some universities have accepted funding for Middle East studies or Islamic law programs from foreign royal families or businessmen. But [previous](#) investigative efforts to track the funding for student-led BDS movements have found that the amounts of money involved are relatively modest; one funding stream is student government grants of between \$267 and \$1,479 per academic year to individual SJP chapters on university campuses.

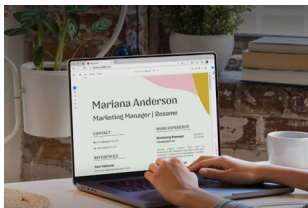
The AJP Educational Foundation, Inc., which describes its goal as publishing “educational materials to raise awareness on Palestine and the Middle East,” listed revenues of \$824,710 for 2014, up from \$567,188 in 2013. It is the fiscal sponsor of American Muslims for Palestine (AMP), whose website [says](#), “We are a strictly American organization working for Americans in America. We are donor-funded. All

of our fundraising is conducted within the United States; all of our funds and work is kept within the US.”

AMP [advertises](#) that it “dedicates a large portion of its budget to support student activism on college campuses. We are here to offer free materials, information, speakers, infrastructure like the apartheid wall, and grants to help ensure your group has the best chance possible of achieving your goals.”

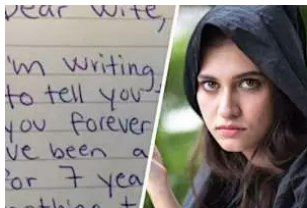
AMP is having its own upcoming conference November 24-26 in Chicago, a meeting that it is touted as “the largest gathering for Palestine in the US.” Tickets for college students are available at a discounted price.





**Meet the powerful tools everyone needs...**

Learn how to create, edit, e-sign, and so...  
Adobe Systems Incorp...



**Woman Missing for Decades Found Alive in...**

Loan Societies



**Do You Know What Follicular Lymphoma Is?...**

Topic | Search Ads



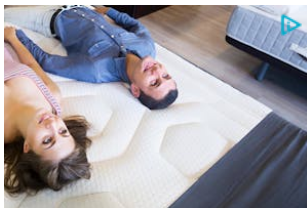
**Find Results For Check Out Delaware...**

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Yahoo Search



**[Photos] Caitlin Clark And Her Partner Who...**

Caitlin Clark Steps Out With New Partn...  
Daily Sports Reporter



**Find Results For Best Mattress For Seniors With Ba...**

Discover the secret to a perfect night's sle...  
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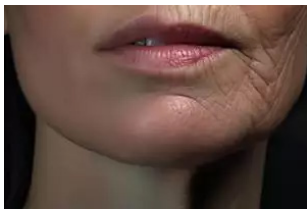
**[Gallery] Restaurant In Texas Has The...**

magazine.todo



**Find Results For Trusted Delaware Statutory Trust...**

Discover the best 1031 exchange...  
Yahoo Search



**Costco Shoppers Say This Wrinkle Cream Is...**

brunchesnocrunches.com

Recommended by Outbrain

# EXHIBIT 5



**National Students for Justice in Palestine** ✓

@NationalSJP

For @Mondoweiss, Carrie Zaremba of National SJP's Steering Committee breaks down the militarized doctrine behind new campus anti-protest policies

← **Post**

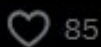
**"U.S. Universities Spent the Summer Strategizing to Suppress Student Activism. Here Is Their Plan."**



U.S. universities spent the summer strategizing to suppress student activism. Here is th...

From mondoweiss.net

3:19 PM · Sep 2, 2024 · **8,822** Views



# EXHIBIT 6

RANK AND FILE FOR A DEMOCRATIC UNION

## DYLAN KUPSH FOR ASE STATEWIDE CHAIR

FORMER UCSB BARGAINING TEAM MEMBER, STUDENT LABOR ACTION PROJECT ORGANIZING MEMBER, GRADUATE STUDENTS FOR JUSTICE IN PALESTINE ORGANIZING MEMBER, NATIONAL STUDENTS FOR JUSTICE IN PALESTINE STEERING COMMITTEE MEMBER, FOUNDING UC DIVEST STEERING COMMITTEE MEMBER

Hi, my name is Dylan Kupsh (he/him), and I'm a third-year PhD student in Computer Science running for ASE Statewide Chair with [Rank and File for a Democratic Union](#) and [Reform UC-UAW](#). I was formerly the Santa Barbara Unit Chair and an active member of the International UAW reform caucus, [Unite All Workers for Democracy \(UAWD\)](#).

In the past years, our local's administrative caucus, or majority party, has gradually consolidated authority, eliminating meaningful rank-and-file participation, moving decision-making behind closed doors, and conceding on key issues (like COLA, Access Needs, etc) faced by academic workers.

By contrast, I'm running for ASE Statewide Chair to **return our union's power to the membership** and **prioritize the demands of our most marginalized colleagues**. I'm running to lead a union that will win, without concessions, a **COLA4ALL** contract that includes:

- **A Cost of Living Adjustment:** Wage increases, tied to the housing market, that eliminate rent burden for *all* campus workers.
- **No Tiers:** The highest-paid graduate worker makes around \$15,000/year more than the lowest-paid. We need a [simplified system](#) that abolishes steps and brings everybody up to the highest payscale. No Step Tiers. No Appointment Length Tiers. No "Prestige Campus" Tiers. Abolish *all* tiers.
- **Appointment Guarantees:** With the current contract, the UC has subjected departments to punitive austerity measures, decreasing employment percentages, increasing workloads, and cutting available appointments. We need centralized funding that guarantees 12-month employment contracts to *all* academic workers.
- **Cops Off Campus:** The abolition of UCPD and removal of police from campuses. An end to the UC's militarized response to student protest and constant surveillance of students and employees.
- **Divestment:** Divestment of university finances from the oppression of Palestinians. Transitional funding for academic workers refusing to work under grants funded by military contractors.
- **Fee Remissions:** Abolition of NRST, PDST, and other university fees for **ALL** academic workers. We shouldn't have to pay to work at UC!
- **Support for Parent Workers:** Full childcare reimbursement, increased parental leave, and dependent healthcare coverage.
- **And More!**



To achieve these ambitious demands, our union must:

- **End Concessionary and Closed-Door Bargaining:** All contract bargaining sessions must be open to all members, no exceptions. We must oppose sidebars and back-room, off-the-record negotiations between UC Administration and the bargaining team, or the pushing through major hasty decisions over academic breaks.
- **Build Joint Struggle:** Building coalitions, communities, and solidarity with affinity organizations (like Students for Justice in Palestine, Environmental Justice organizations, graduate and undergraduate student associations, etc) across our campuses, incorporating their demands into our campaigns and strengthening each other in turn.
- **Taking Strategic Action:** Our demands aren't won through symbolic marches, speeches, and walking in circles. We need to take strategic action that engages our membership, while maximizing disruptive and material impact on UC.

These next three years represent a pivotal moment for our union. Will we recenter our demands around marginalized workers or will we continue the current leadership's practice of paying lip service to their needs but then spinelessly bargaining them away?

**VOTE: DYLAN KUPSH FOR ASE STATEWIDE CHAIR**

# **EXHIBIT 7**

**Read: The truth about campuses***A look into the largest student anti-war movement in a half-century.***Read Now****TAKE ACTION****THE WIRE****ABOUT****JOIN US****CONTRIBUTE****Donate to JVP**

Jewish Voice for Peace is the largest progressive Jewish anti-Zionist organization in the world. We're organizing a grassroots, cross-class, intergenerational movement of U.S. Jews into solidarity with the Palestinian freedom struggle, guided by a vision of justice, equality, and dignity for all people.

Take future action with a single click.  
Log in or Sign up for FastAction

**Contribution Information**

☒ One-Time ☐ Monthly

Consider giving monthly

\$1,800

\$540

\$360

\$54

\$36

\$18

\$0.00

☒ I'd like to help cover the transaction fees for my contribution. My total amount will be **\$18.78**.

Pay with Card

Pay with Bank Account



If you would like to designate this gift *in honor* or *in memory* of someone, please send an email with the particulars to [info@jvp.org](mailto:info@jvp.org), so that we can notify whomever you designate.

If you have any questions, please call us at (510) 465-1777 or send an email to [info@jvp.org](mailto:info@jvp.org). Jewish Voice for Peace respects and guards your privacy.

JVP EIN: 90-0018359.



P.O. Box 589  
Berkeley, CA 94701  
(510) 465-1777

Media requests:  
[media@jvp.org](mailto:media@jvp.org)  
(929) 290-0317

**TAKE ACTION**

Act Now  
Join JVP  
Campaign With Us  
Ways to Give

**ABOUT**

Our Mandate  
Our Vision  
Building Justice  
Annual Report  
Jobs with JVP  
JVP FAQ

**JOIN US**

Who We Are  
Membership FAQ  
**WAYS TO GET INVOLVED**  
Organize Locally  
Student Network  
Havurah Network  
Rabbinical Council  
BIJOCISM Network  
Health Advisory Council

**CONTRIBUTE****BECOME A MEMBER**

# EXHIBIT 8

**COMMUNITY JUSTICE EXCHANGE**English | Español

# DONATE

Community Justice Exchange is a nonprofit 501(c)3 project of the Tides Center.

Your gift may be tax-deductible pursuant to §170(c) of the Internal Revenue Code.

Please visit [www.tides.org/state-nonprofit-disclosures](http://www.tides.org/state-nonprofit-disclosures) for additional information.

Our EIN#: 94-3213100

## ONLINE DONATIONS

To support payment of bail and bond by local NBFN funds:

**DONATE TO THE EMERGENCY RAPID RESPONSE FUND**

To support the payment of immigration bond by the National  
Bail Fund Network:

**DONATE TO THE FREEDOM FUND**

To support our work at Community Justice Exchange:

**DONATE TO CJE**

---

## **CHECK DONATIONS**

Checks can be made payable to the Tides Center (with  
Community Justice Exchange in the memo):

**Tides Center**  
P.O Box 889385  
Los Angeles, CA 90088-9385

# EXHIBIT 9

\*\* PUBLIC DISCLOSURE COPY \*\*

Form <b>990</b> Department of the Treasury Internal Revenue Service	<b>Return of Organization Exempt From Income Tax</b> Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations) Do not enter social security numbers on this form as it may be made public. Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for instructions and the latest information.	OMB No. 1545-0047 <div style="border: 2px solid black; padding: 5px; font-size: 24pt; font-weight: bold;">2022</div> Open to Public Inspection
---	--	---

<b>A For the 2022 calendar year, or tax year beginning and ending</b>			
<b>B</b> Check if applicable:	<b>C Name of organization</b>	<b>D Employer identification number</b>	
<input checked="" type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Final return/terminated <input checked="" type="checkbox"/> Amended return <input type="checkbox"/> Application pending	<b>TIDES CENTER</b>	<b>94-3213100</b>	
	Doing business as		
	Number and street (or P.O. box if mail is not delivered to street address) Room/suite	<b>E Telephone number</b> <b>(415) 561-6300</b>	
	<b>1012 TORNEY AVENUE</b>		
	City or town, state or province, country, and ZIP or foreign postal code	<b>G Gross receipts \$</b> <b>327,108,721.</b>	
	<b>SAN FRANCISCO, CA 94129</b>		
	<b>F Name and address of principal officer: JANIECE EVANS-PAGE</b>	<b>H(a) Is this a group return for subordinates? Yes <input checked="" type="checkbox"/> No</b>	
	<b>SAME AS C ABOVE</b>		
	<b>I Tax-exempt status: <input checked="" type="checkbox"/> 501(c)(3) 501(c) ( ) (insert no.) 4947(a)(1) or 527</b>	<b>H(b) Are all subordinates included? Yes No</b> If "No," attach a list. See instructions	
	<b>J Website: WWW.TIDES.ORG</b>		
	<b>K Form of organization: <input checked="" type="checkbox"/> Corporation Trust Association Other</b>	<b>L Year of formation: 1994</b>	
		<b>M State of legal domicile: CA</b>	

<b>Part I Summary</b>																											
<b>Activities &amp; Governance</b>	<b>1</b> Briefly describe the organization's mission or most significant activities: <b>TIDES CENTER ACCELERATES THE PACE OF SOCIAL CHANGE, WORKING WITH INNOVATIVE PARTNERS TO SOLVE</b>																										
	<b>2</b> Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.																										
	<b>3</b> Number of voting members of the governing body (Part VI, line 1a)	<b>3</b>	<b>8</b>																								
	<b>4</b> Number of independent voting members of the governing body (Part VI, line 1b)	<b>4</b>	<b>8</b>																								
	<b>5</b> Total number of individuals employed in calendar year 2022 (Part V, line 2a)	<b>5</b>	<b>864</b>																								
	<b>6</b> Total number of volunteers (estimate if necessary)	<b>6</b>	<b>810</b>																								
	<b>7a</b> Total unrelated business revenue from Part VIII, column (C), line 12	<b>7a</b>	<b>0.</b>																								
	<b>b</b> Net unrelated business taxable income from Form 990-T, Part I, line 11	<b>7b</b>	<b>0.</b>																								
<b>Revenue</b>	<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Prior Year</th> <th>Current Year</th> </tr> </thead> <tbody> <tr> <td><b>8</b> Contributions and grants (Part VIII, line 1h)</td> <td>501,815,757.</td> <td>240,178,205.</td> </tr> <tr> <td><b>9</b> Program service revenue (Part VIII, line 2g)</td> <td>14,391,645.</td> <td>37,628,314.</td> </tr> <tr> <td><b>10</b> Investment income (Part VIII, column (A), lines 3, 4, and 7d)</td> <td>29,562.</td> <td>3,382,268.</td> </tr> <tr> <td><b>11</b> Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)</td> <td>336,880.</td> <td>285,985.</td> </tr> <tr> <td><b>12</b> Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)</td> <td>516,573,844.</td> <td>281,474,772.</td> </tr> </tbody> </table>				Prior Year	Current Year	<b>8</b> Contributions and grants (Part VIII, line 1h)	501,815,757.	240,178,205.	<b>9</b> Program service revenue (Part VIII, line 2g)	14,391,645.	37,628,314.	<b>10</b> Investment income (Part VIII, column (A), lines 3, 4, and 7d)	29,562.	3,382,268.	<b>11</b> Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	336,880.	285,985.	<b>12</b> Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)	516,573,844.	281,474,772.						
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<b>Part II Signature Block</b>					
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.					
<b>Sign Here</b>	Signature of officer <b>JAMES LUM, CFO/TREASURER</b> Type or print name and title				Date
<b>Paid Preparer Use Only</b>	Print/Type preparer's name <b>JOCELYNE MILLER</b>	Preparer's signature <i>Jocelyn C. Miller</i>	Date 2/13/24	Check if self-employed <input type="checkbox"/>	PTIN <b>P00634378</b>
	Firm's name <b>DELOITTE TAX LLP</b>			Firm's EIN <b>86-1065772</b>	
	Firm's address <b>12830 EL CAMINO REAL, SUITE 600 SAN DIEGO, CA 92130</b>			Phone no. (619) 232-6500	

May the IRS discuss this return with the preparer shown above? See instructions		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
232001 12-13-22 LHA For Paperwork Reduction Act Notice, see the separate instructions. Form <b>990</b> (2022)		
<b>SEE SCHEDULE O FOR ORGANIZATION MISSION STATEMENT CONTINUATION</b>		

# EXHIBIT 10



## ABOUT

## RESOURCES

## CAMPAIGNS

## NETWORKS

GIVE

## CONTACT

USCPR ACTION 

9

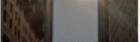
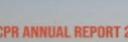
DONATE [Homepage](#) > [Finances](#)

USCPR is a 501(c)3 charitable organization registered in the U.S. All contributions to USCPR are tax-deductible to the fullest extent allowed by law.

Our Federal Identification (EIN) is 42-1636592.

From boycott and divestment campaigns aimed at holding occupation profiteers accountable to grassroots political organizing focused on implementing weapons sanctions on Israel, we are working in communities across the country to educate, organize, and advocate for Palestinian rights.

## A large crowd of people is gathered for a protest or demonstration. In the foreground, a person in a bright green outfit is walking. A large black banner with white text is visible, partially obscured by the crowd. The text 'ANNUAL REPORT 2023' is overlaid in large white letters, and 'US CAMPAIGN FOR PALESTINIAN RIGHTS' is written in smaller white letters below it. The background shows a city street with buildings and more protesters.

2022	2021	2020	2019
 <p>ANNUAL REPORT 2022 for the Corporation for Public Programs</p>	 <p>ANNUAL REPORT 2021 for the Corporation for Public Programs</p>	 <p>ANNUAL REPORT 2020 for the Corporation for Public Programs</p>	 <p>CPR ANNUAL REPORT 2019 BUILDING TOWARD JUSTICE FOR ALL</p>
Form 990	Form 990	Form 990	Form 990



"To reach the Platinum level, USCPR added extensive information to its Nonprofit Profile on GuideStar. By taking the time to provide this information, USCPR has demonstrated its commitment to transparency and to giving donors and funders meaningful data to evaluate USCPR."



"The GreatNonprofits Top-Rated Awards is the one and only people's choice award where volunteers, donors, and people served by nonprofits are asked to share stories of inspiration, express their appreciation, and potentially help nonprofits earn a spot on the prestigious GreatNonprofits Top-Rated Nonprofits List."

## RESOURCES

## Activist Resources

Boycott, Divestment, and Sanctions  
U.S. Military Funding to Israel Map  
Palestine 101  
Organizing 101  
Grassroots Advocacy Toolkit  
COVID-19 Organizing Toolkit  
Ethical Travel to Palestine  
Speakers and Trainers  
Online Events  
Freedom is the Future

### Joint Struggles

Indigenous Struggles  
Black Palestine Solidarity  
Colonization and Gentrification  
Myth of Citizenship  
No To All Bans  
Faithwashing & Islamophobia  
Palestine is a Feminist Issue  
Palestine as a Queer Struggle  
Palestine: A Reproductive Justice Issue  
From Palestine to Mexico  
Global Impact of Zionism  
Comprehensive Curriculum

## CAMPAIGNS

### Current Campaigns

End U.S. Military Funding to Israel  
Greenwashing  
#StandWithThe6  
Demilitarize U.S. to Palestine  
End Medical Apartheid  
#DroptheADL  
Right to Boycott for Justice

## Historic Campaigns

## NETWORKS

Connect With a Local Group  
Black Christians for Palestine  
Not On Our Dime!  
USCPR Youth Fellows

## ABOUT US

## IN THE NEWS

**WORK WITH US**

## WAYS TO GIVE



## US CAMPAIGN FOR PALESTINIAN RIGHTS

DONATE 

## TAKE ACTION

## CONTACT



# EXHIBIT 11



## US Campaign for Palestinian Rights

**Yes, I want to join you in  
working for Palestinian rights!**

**TO DONATE BY MAIL**, please fill out the form below.

**TO DONATE BY PHONE** with a credit card, call us at (703) 312-6360.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

**I would like to make** *(please fill in one option):*

- ☐ A one-time contribution of \$ \_\_\_\_\_
- ☐ Monthly contributions of \$ \_\_\_\_\_ starting on (preferred date) \_\_\_\_\_

**I am donating by** *(please check one):*

- ☐ An enclosed check made out to either "US Campaign for Palestinian Rights" or "USCPR."
- ☐ Credit card. Please charge my *(check one)*: ☐ Visa ☐ MasterCard ☐ AmEx ☐ Discover

Credit card number: \_\_\_\_\_ Expiration date: \_\_\_\_\_

3- or 4-digit CVV code: \_\_\_\_\_ Cardholder name: \_\_\_\_\_

Signature of card holder: \_\_\_\_\_

**Other options** *(optional)*

- ☐ I would like to learn about including USCPR in my estate plan.
- ☐ My employer will match my gift. My employer is: \_\_\_\_\_
- ☐ My gift is in honor of/in memory of: \_\_\_\_\_

Please return this form to:

**USCPR**

**P.O. Box 3609**

**Washington, DC 20027**

*USCPR is a 501(c)3 charitable organization and all contributions are tax-deductible to the fullest extent allowed by law. Our EIN (tax ID number) is 42-1636592.*

# EXHIBIT 12



## Support American Muslims for Palestine: Stand With Gaza

In these critical times, as Gaza faces profound challenges, the work of American Muslims for Palestine (AMP) becomes more vital than ever. Our commitment to advocating for justice, educating the public, and organizing at the grassroots level is unwavering. However, to sustain and expand our impact, we need your help.

By supporting AMP, you become a vanguard of freedom and justice. Join us in our mission to promote justice, equality, and human rights. Your donation will empower our initiatives to educate, advocate, and organize — creating lasting change and advancing knowledge and understanding.

## Support AMP Today!

*AJP Educational Foundation (AJP) is a tax-exempt, 501(c)(3) organization, and is the fiscal sponsor of The American Muslims for Palestine (AMP), EIN # 27-1365284. All donations to AJP are tax-deductible. AMP is also Zakat-eligible!*

## Your Gift Amount

\$25

\$50

\$100

\$250

\$500

\$1,000

\$2,500

\$5,000

\$

Other

- ☐ Make this donation recurring (select above)
- ☐ Increase my donation amount to cover fees

## Your Payment Details



Card Number\*

Security Code\*

Expiration Month\*

MM

Expiration Year\*

YYYY

Name on Card\*

## Your Info

First Name\*

Last Name\*

Address, line 1\*

City\*

State\*

Zip Code\*

Email Address\*

Phone

☒ I'd like to receive updates from this organization

DONATE NOW



6404 Seven Corners Place STE N | Falls Church, VA 22044

703-534-3032 | info@ampalastine.org

# EXHIBIT 13

Language ▾

PROPOSAL

AGREEMENT

RESOURCES

CONTACT



# Coordinated Economic Blockade to Free Palestine

Monday, April 15, 2024

The global economy is complicit in genocide. Join participating cities in blocking the arteries of capitalism and jamming the wheels of production.

LEARN MORE



## PARTICIPATING CITIES INCLUDED:

Sydney, Australia; Canberra, Australia; Kansas City, USA; Melbourne, Australia; Halifax, Canada; St. Louis, USA; Western MA, USA + Middleton, USA; Chicago, USA; Ho Chi Minh City, Vietnam; Miami, USA; Seattle, USA; Bay Area/San Francisco + Metro, USA; Portland, USA; Eugene, USA; Philadelphia, USA; Vancouver, Canada; Kent, United Kingdom; Montreal, Canada; Hudson Valley, USA; New York City, USA; Detroit/Dearborn, USA; Brussels, Belgium; Rouyn-Noranda, Canada; Montreal, Canada; Peterborough, Canada; Johannesburg, SA; London, UK; Atlanta, USA; Adelaide, Australia; Seoul, South Korea; San Antonio, USA; Long Beach, USA; Cincinnati, USA; Utrecht, Netherlands; Belfast, Ireland; Toronto, Canada; Providence, USA; Fremont, USA; Edmonton, Canada; Tampa, USA; Ceredigion, UK; Athens, Greece; Maui, USA; Ottawa, Canada; Dublin, Ireland; Genoa, Italy; Leicester, UK; Zurich, Switzerland; Newcastle, Australia; Manchester, UK; Elizabeth, USA; Maple Grove, USA; Copenhagen, Denmark; Rennes, France; Hume, Australia; Catalonia, Spain; Brisbane, Australia; Alice Springs, Australia; Tallahassee, USA; Hobart, Australia; Castlemaine, Australia; Geelong, Australia; Darwin, Australia; Nigeria; Tarragona, Spain; Barcelona, Spain; Shannon, Ireland; Medellin, Colombia; Houston, USA; St. Paul, USA; Calgary, Canada; Regina, Canada; Tucson, USA; Phoenix, USA; Mexico City, Mexico; Margate, UK; Leeds, UK; Bristol, UK; Newcastle, UK; Stockholm, Sweden; Mount Pearl, Newfoundland; Labrador, Canada

A proposal to coordinate a multi-city economic blockade on April 15th in solidarity with Palestine recently received overwhelming commitments to participate around the US and internationally.

The proposal states that in each city, we will **identify and blockade major choke points** in the economy, focusing on points of production and circulation **with the aim of causing the most economic impact**, as did the port shutdowns in recent months in Oakland, California and Melbourne, Australia, as just a few examples.

There is a sense in the streets in this recent and unprecedented movement for Palestine that escalation has become necessary: **there is a need to shift from symbolic actions to those that cause pain to the economy.**

As Yemen is bombed to secure global trade, and billions of dollars are sent to the Zionist war machine, we must recognize that the global economy is complicit in genocide and **together we will coordinate to disrupt and blockade economic logistical hubs and the flow of capital.**



## Mutual Solidarity Agreement for April 15

We will act in solidarity with each other in the face of attacks from the media, politicians and the police and the Zionist project. We will support each other in the following ways:

If one city faces police repression, other cities will extend or expand their blockades or initiate other actions in response if able to the best of their abilities and capacity

We will not attack each other or each other's actions on social media or to the press. We will hold a post-action debrief so that we can raise principled critiques among ourselves in a constructive manner rather than publicly.

Every city will take responsibility for choosing and planning their own local actions. Fellow organizers will not discourage or denounce each others plans because solidarity means affinity, not ownership.

We will keep each other safe by not talking to the police, not coordinating with the police, and not talking to them about our actions or our fellow organizers.

# Anti-Repression Resources

Content will be updated daily! Click on the plus icon to open the tab.

Every city should [contact their local National Lawyers Guild chapter](#) to begin discussing what legal support they can provide, including legal observers, know your rights trainings, and access to a local bail fund.

## – U.S. Bail & Legal Defense Funds

### United States A15 Bail & Legal Defense Fund!

Donate here to support community members who are criminalized in the U.S. for their solidarity with Palestine. Should the actions of the state result in the need for it, these funds will be used for bail, legal defense, and support for defendants.

[DONATE TO U.S. FUND](#)

### Indianapolis A15 Bail & Legal Defense Fund

Donate here to support community members who are criminalized in the U.S. for their solidarity with Palestine. Should the actions of the state result in the need for it, these funds will be used for bail, legal defense, and support for defendants.

[DONATE TO INDIANAPOLIS FUND](#)

+ Legal Resources

+ Graphics & Fliers

## A Reminder from the National Lawyer's Guild



## Regional and Local Contacts

Due to the sensitive nature of this action, some folks organizing for April 15th prefer to remain anonymous, or embedded solely within their existing communities. If you are organizing within your community and would like your email added here, please send it to [A15EconomicBlockade@proton.me](mailto:A15EconomicBlockade@proton.me).

**Australia:** [Instagram](#)

**Austria:** [A15Austria@proton.me](mailto:A15Austria@proton.me)

**Belfast:** [A15Belfast@proton.me](mailto:A15Belfast@proton.me)

**Brussels:** [A15Brussels@proton.me](mailto:A15Brussels@proton.me)

**Canada:** [A15Can@proton.me](mailto:A15Can@proton.me)

**Chicago:** [A15Chicago@proton.me](mailto:A15Chicago@proton.me)

**Detroit:** [A15Detroit@proton.me](mailto:A15Detroit@proton.me)

**Dublin:** [A15Dublin@proton.me](mailto:A15Dublin@proton.me)

**Florida:** [A15Florida@proton.me](mailto:A15Florida@proton.me)

**Fremont:** [A15Fremont@proton.me](mailto:A15Fremont@proton.me)

**Halifax:** [A15HFX@proton.me](mailto:A15HFX@proton.me) / [Instagram](#)

**Houston:** [A15Houston@proton.me](mailto:A15Houston@proton.me)

**Indianapolis:** [A15Indy@protonmail.com](mailto:A15Indy@protonmail.com)

**London:** [A15London@proton.me](mailto:A15London@proton.me) / [Telegram](#)

**Massachusetts:** [A15WestMass@proton.me](mailto:A15WestMass@proton.me)

**Maui:** [Instagram](#)

**Melbourne:** [A15Melbourne@proton.me](mailto:A15Melbourne@proton.me)

**Mexico:** [Instagram](#)

**Minn/St Paul:** [A15mpls-sp@proton.me](mailto:A15mpls-sp@proton.me)

**Montreal:** [A15Mtl@proton.me](mailto:A15Mtl@proton.me) / [Instagram](#)

**Netherlands:** [A15Netherlands@proton.me](mailto:A15Netherlands@proton.me) / [Instagram](#)

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**Oregon:** [A15Oregon@proton.me](mailto:A15Oregon@proton.me)

**Ottawa:** [A15Ottawa@proton.me](mailto:A15Ottawa@proton.me) / [Instagram](#)

**Philadelphia:** [A15Philly@proton.me](mailto:A15Philly@proton.me)

**San Antonio:** [A15SanAntonio@proton.me](mailto:A15SanAntonio@proton.me) / [Instagram](#)

**Seattle:** [A15\\_Seattle@proton.me](mailto:A15_Seattle@proton.me)

**SoCal:** [A15SoCal@proton.me](mailto:A15SoCal@proton.me)

**Toronto:** [A15Toronto@proton.me](mailto:A15Toronto@proton.me)

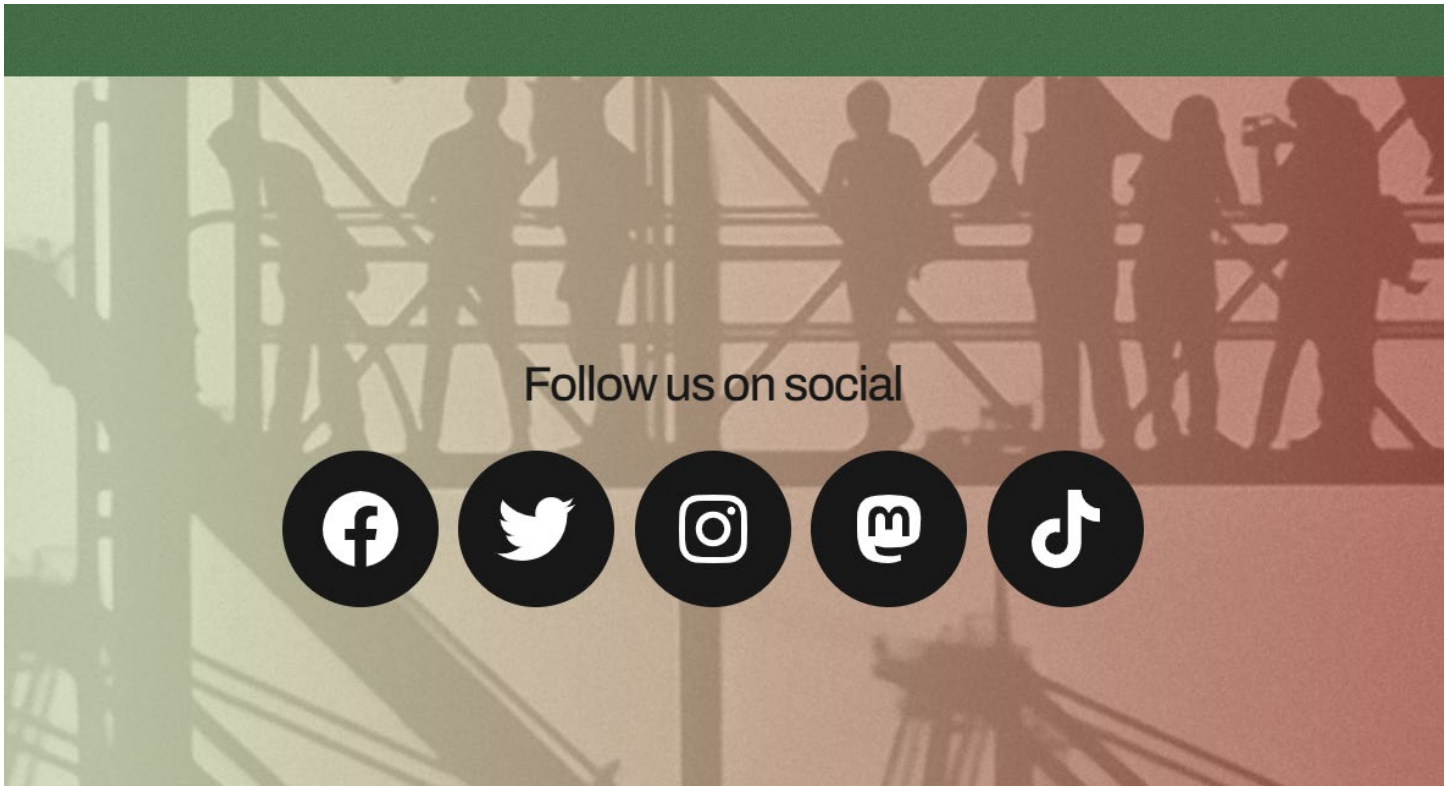
## Questions & Press Requests

Send a message to

[A15EconomicBlockade\(at\)proton.me](mailto:A15EconomicBlockade(at)proton.me)

EMAIL US



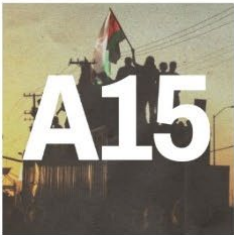


# EXHIBIT 14

## WHOIS search results

Domain Name: A15ACTION.COM  
Registry Domain ID: 2865726453\_DOMAIN\_COM-VRSN  
Registrar WHOIS Server: whois.squarespace.domains  
Registrar URL: <http://squarespace.domains>  
Updated Date: 2024-03-22T04:12:37Z  
Creation Date: 2024-03-22T04:12:37Z  
Registry Expiry Date: 2025-03-22T04:12:37Z  
Registrar: Squarespace Domains LLC  
Registrar IANA ID: 3827  
Registrar Abuse Contact Email: [abuse-complaints@squarespace.com](mailto:abuse-complaints@squarespace.com)  
Registrar Abuse Contact Phone: 1-646-693-5324  
Domain Status: clientDeleteProhibited <https://icann.org/epp#clientDeleteProhibited>  
Domain Status: clientTransferProhibited <https://icann.org/epp#clientTransferProhibited>  
Name Server: NS-CLOUD-E1.GOOGLEDOMAINS.COM  
Name Server: NS-CLOUD-E2.GOOGLEDOMAINS.COM  
Name Server: NS-CLOUD-E3.GOOGLEDOMAINS.COM  
Name Server: NS-CLOUD-E4.GOOGLEDOMAINS.COM  
DNSSEC: unsigned  
URL of the ICANN Whois Inaccuracy Complaint Form: <https://www.icann.org/wicf/>  
>>> Last update of whois database: 2024-08-05T18:49:01Z <<<

# EXHIBIT 15



**This fundraiser is not currently accepting any donations.**

Thank you for your interest in making a donation. At this time, the fundraiser is not accepting donations. This may be temporary.

If you have any questions, please [contact us](#) and we'll do our best to help.

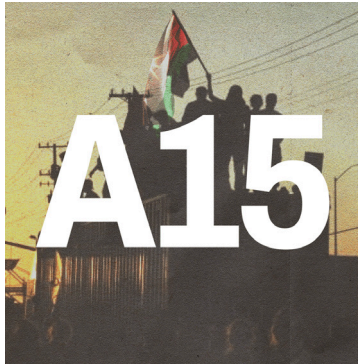
**Fundraiser Information**

Fundraiser: Community Justice Exchange

Website: <https://www.communityjusticeexchange.org/nbfn-directory/> [↗](#)

ActBlue Charities is a qualified 501(c)(3) tax-exempt organization and donations are tax-deductible to the full extent allowed under the law.

# EXHIBIT 16



## Support the A15 Bail & Legal Defense Fund!

On April 15th, people from over 30 cities around the world will take action to demand a free Palestine.

Donate here to support community members who are criminalized in the U.S. for their solidarity with Palestine.

Should the actions of the state result in the need for it, these funds will be used for bail, legal defense, and support for defendants.

### Choose an amount:

Your contribution will benefit Community Justice Exchange.

\$25

\$100

\$250

\$1,000

\$

### Make it monthly!

Yes, count me in!

✓ No, donate once

### Checkout

[E](#) Have an ActBlue Express account? [Sign in to give faster.](#)



Pay with card

Or

PayPal

venmo

#### Contribution rules

1. This contribution is made from my own funds or the funds of an authorizing corporation or other entity, and the funds are not being provided by any other person or entity.
2. ActBlue Charities is a registered charitable organization formed to democratize charitable giving. All donations made through our website are contributions to the organization(s) to which you've selected to contribute. A copy of our latest financial report may be obtained by emailing [info@actblue.com](mailto:info@actblue.com) or calling (617) 517-7600. Alternatively, our report detailing our programs, a financial summary, and the percentage of contributions dedicated to our charitable purpose, along with a copy of our license, may be obtained from the following state agencies: [FLORIDA](#) (registration #CH46938) – A COPY OF THE OFFICIAL REGISTRATION AND FINANCIAL INFORMATION MAY BE OBTAINED FROM THE DIVISION OF CONSUMER SERVICES BY CALLING TOLL-FREE, 1-800-435-7352 (800-HELP-FLA) WITHIN THE

STATE OR VISITING [www.FloridaConsumerHelp.com](http://www.FloridaConsumerHelp.com); [GEORGIA](#) (registration #CH012361) – contact ActBlue Charities; [MARYLAND](#) (registration #29971) – For the cost of copies and postage, documents and information filed under the Maryland charitable organizations laws can be obtained from the Office of the Secretary of State, State House, Annapolis, MD 21401; [MISSISSIPPI](#) (registration #100024326) – Secretary of State's Office 1-888-236-6167; [NEW JERSEY](#) (registration #CH3867000) – INFORMATION FILED WITH THE ATTORNEY GENERAL CONCERNING THIS CHARITABLE SOLICITATION AND THE PERCENTAGE OF CONTRIBUTIONS RECEIVED BY THE CHARITY DURING THE LAST REPORTING PERIOD THAT WERE DEDICATED TO THE CHARITABLE PURPOSE MAY BE OBTAINED FROM THE ATTORNEY GENERAL OF THE STATE OF NEW JERSEY BY CALLING (973) 504-6215 AND IS AVAILABLE ON THE INTERNET AT <http://www.state.nj.us/lps/ca/charfm.htm>; [NEW YORK](#) (registration #45-25-27) – New York Attorney General's Charities Registry at [www.charitiesnys.com](http://www.charitiesnys.com) or, the Office of the Attorney General, Charities Bureau, 28 Liberty Street, New York, NY 10005, or (212) 416-8686; [NORTH CAROLINA](#) (registration #SL009830) – FINANCIAL INFORMATION ABOUT THIS ORGANIZATION AND A COPY OF ITS LICENSE ARE AVAILABLE FROM THE STATE SOLICITATION LICENSING BRANCH AT 1-888-830-4989.; [PENNSYLVANIA](#) (registration #104758) – Department of State, 800-732-0999; [VIRGINIA](#) – Virginia State Office of Consumer Affairs, Department of Agricultural and Consumer Services, PO Box 1163, Richmond, VA 23218; [WASHINGTON](#) (registration #37969) – Secretary of State, Charities Division, Olympia, WA 98504-0422, 800-332-4483; [WEST VIRGINIA](#) (registration #9826) – Secretary of State, State Capitol, Charleston, WV 25305; [WISCONSIN](#) (registration #16203-800) – contact ActBlue Charities. Registration with and reporting to these agencies does not imply endorsement, approval, or recommendation of ActBlue Charities.

Contributions to the Community Justice Exchange, a project of Tides Center, are tax deductible to the extent permitted by law pursuant to §170(c) of the Internal Revenue Code. Please visit [www.tides.org/state-nonprofit-disclosures](http://www.tides.org/state-nonprofit-disclosures) for more information. Tides Center is a 501(c)(3) nonprofit organization and the nation's largest fiscal sponsor. Our Federal Tax ID# is 94-3213100. Funds may be used for general support.

By proceeding with this transaction, you agree to ActBlue's [terms & conditions](#).

ActBlue Charities is a qualified 501(c)(3) tax-exempt organization and donations are tax-deductible to the full extent allowed under the law.

# EXHIBIT 17

## Regional and Local Contacts

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**Fremont:** A15Fremont@proton.me

**Halifax:** A15HFX@proton.me / [Instagram](#)

**Houston:** A15Houston@proton.me

**Indianapolis:** A15Indy@protonmail.com

**London:** A15London@proton.me / [Telegram](#)

**Massachusetts:** A15WestMass@proton.me

**Maui:** [Instagram](#)

**Melbourne:** A15Melbourne@proton.me

**Mexico:** [Instagram](#)

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**Montreal:** A15Mtl@proton.me / [Instagram](#)

**Netherlands:** A15Netherlands@proton.me / [Instagram](#)

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**Ottawa:** A15Ottawa@proton.me / [Instagram](#)

**Philadelphia:** A15Philly@proton.me

**San Antonio:** A15SanAntonio@proton.me / [Instagram](#)

**Seattle:** A15\_Seattle@proton.me

**SoCal:** A15SoCal@proton.me

**Toronto:** A15Toronto@proton.me

# EXHIBIT 18



**A15EconomicBlockade**

@a15action

Donate here to support community members who are criminalized in the U.S. for their solidarity with Palestine: [bit.ly/a15fund](https://bit.ly/a15fund) #a15forpalestine

Coordinated Economic  
Blockade to Free Palestine

# United States Bail & Legal Defense Fund

Donate at [bit.ly/a15fund](https://bit.ly/a15fund)

A15Action.com

12:41 PM · Apr 13, 2024 · **2,741** Views



# EXHIBIT 19

↻ A15EconomicBlockade reposted

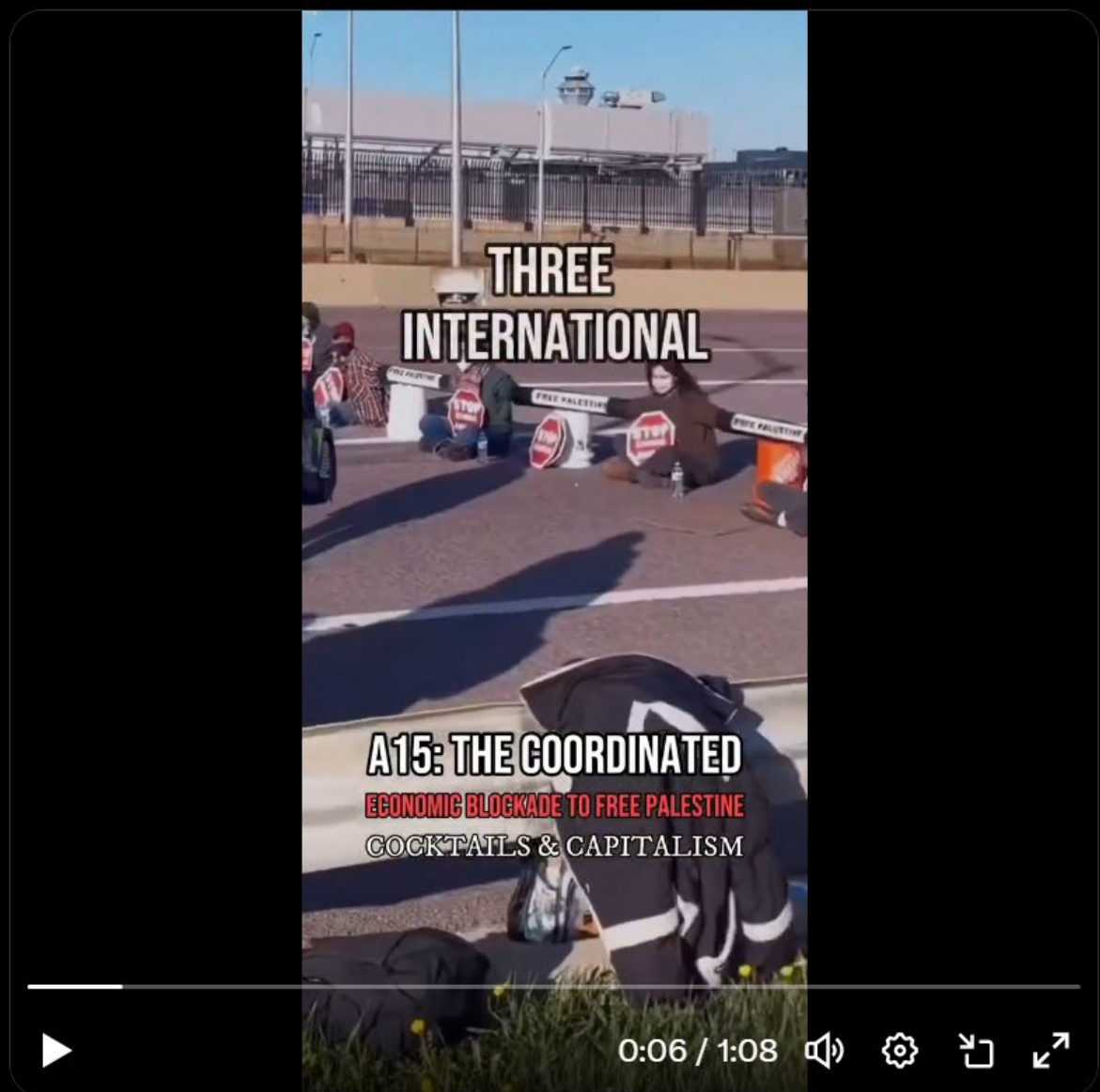


**Cocktails & Capitalism - an anticapitalist po** @CocktCapitali · May 13 ...

Recognizing the global economy's complicity in genocide, folks in 82 cities & 19 countries blockaded economic choke points on April 15th

This exclusive #A15 interview explores the global economic blockade in solidarity with 🇵🇸 & why it was so successful

[tinyurl.com/2zfe6kc9](https://tinyurl.com/2zfe6kc9)



2

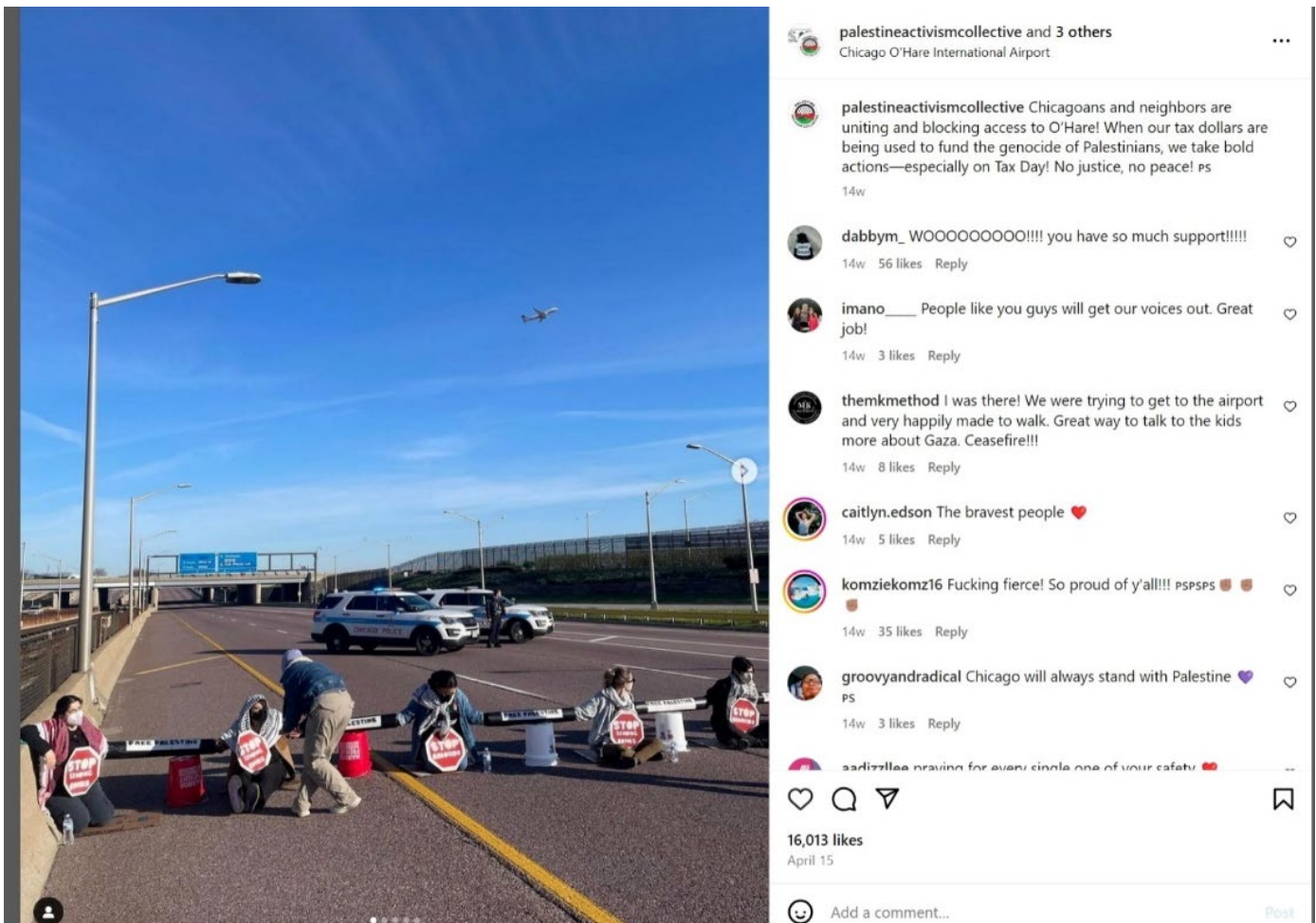
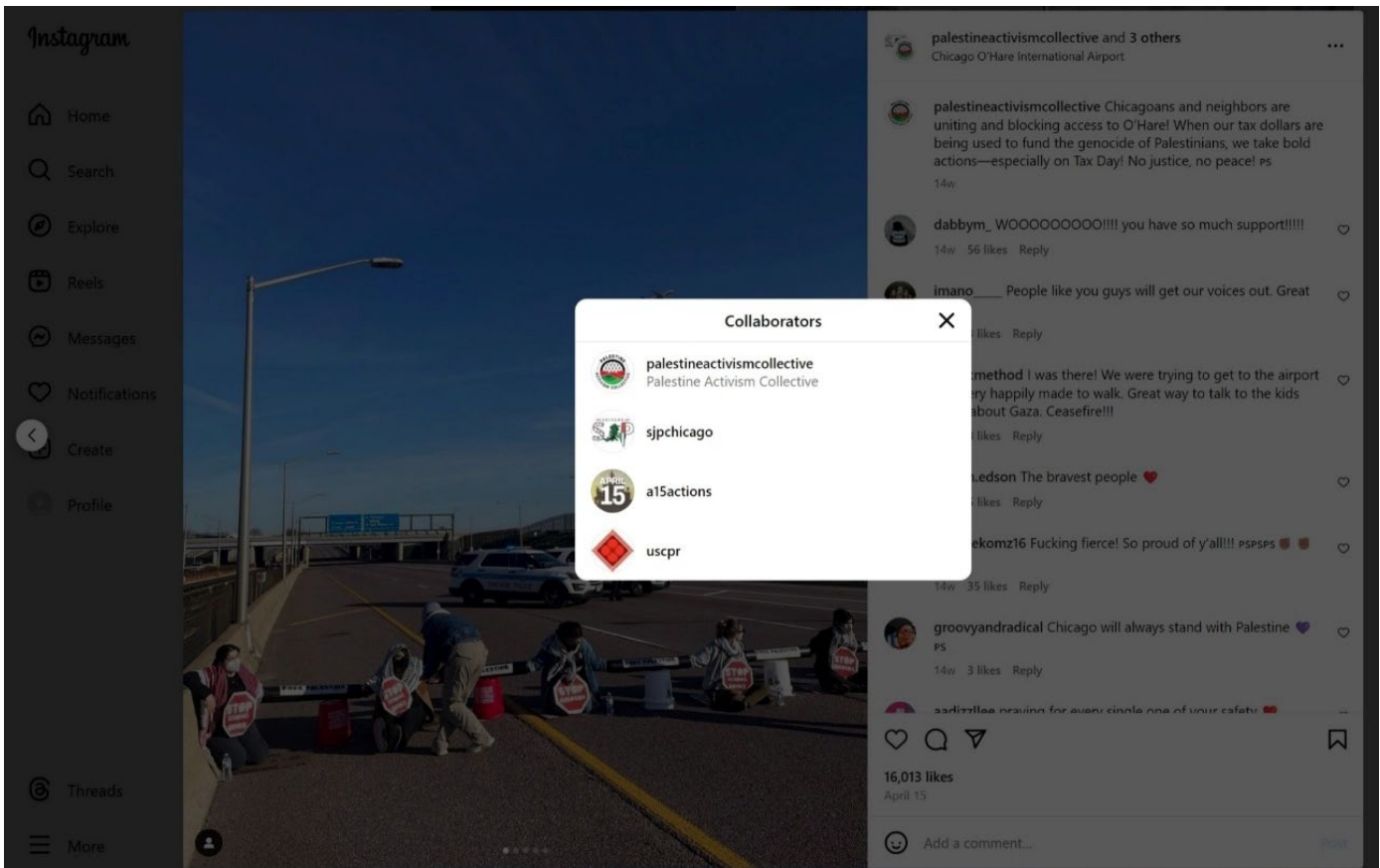
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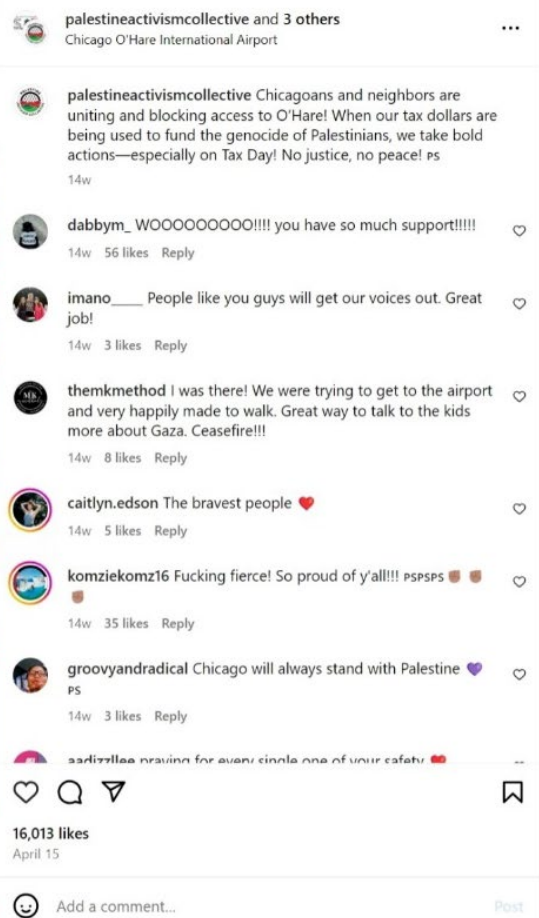
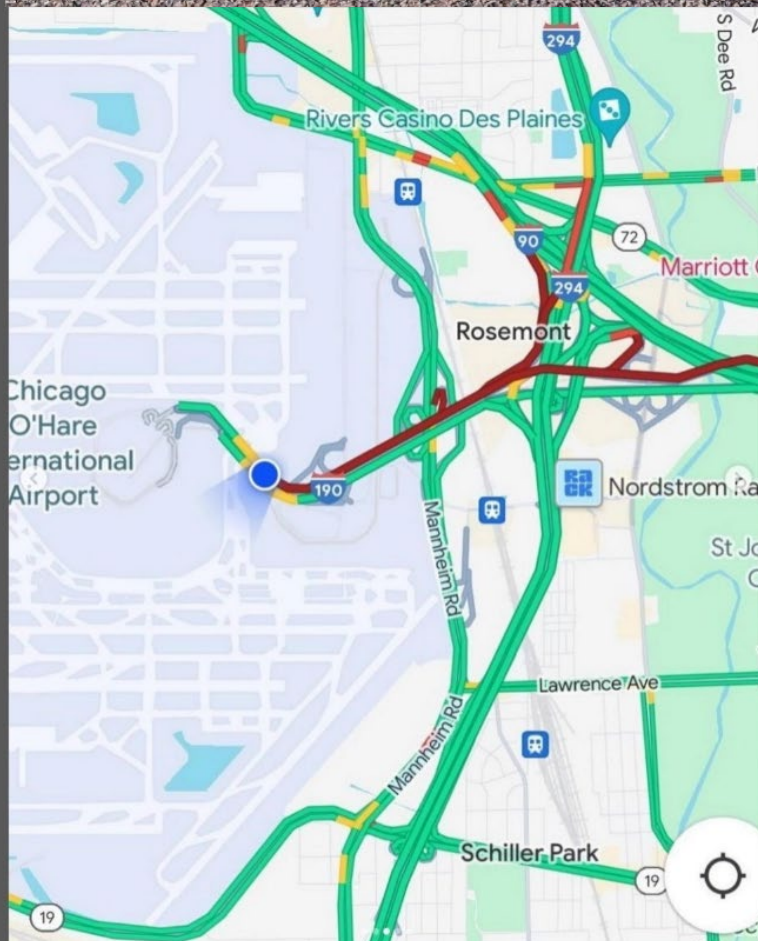
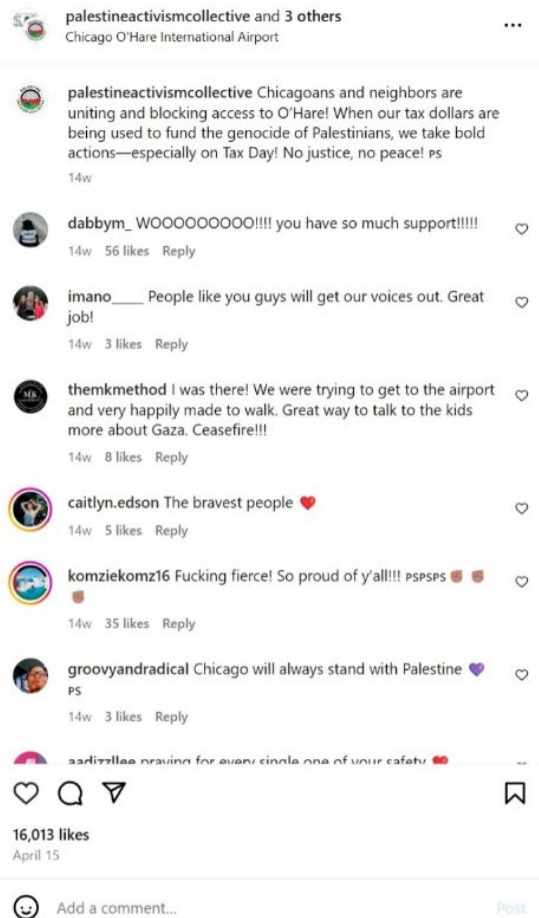
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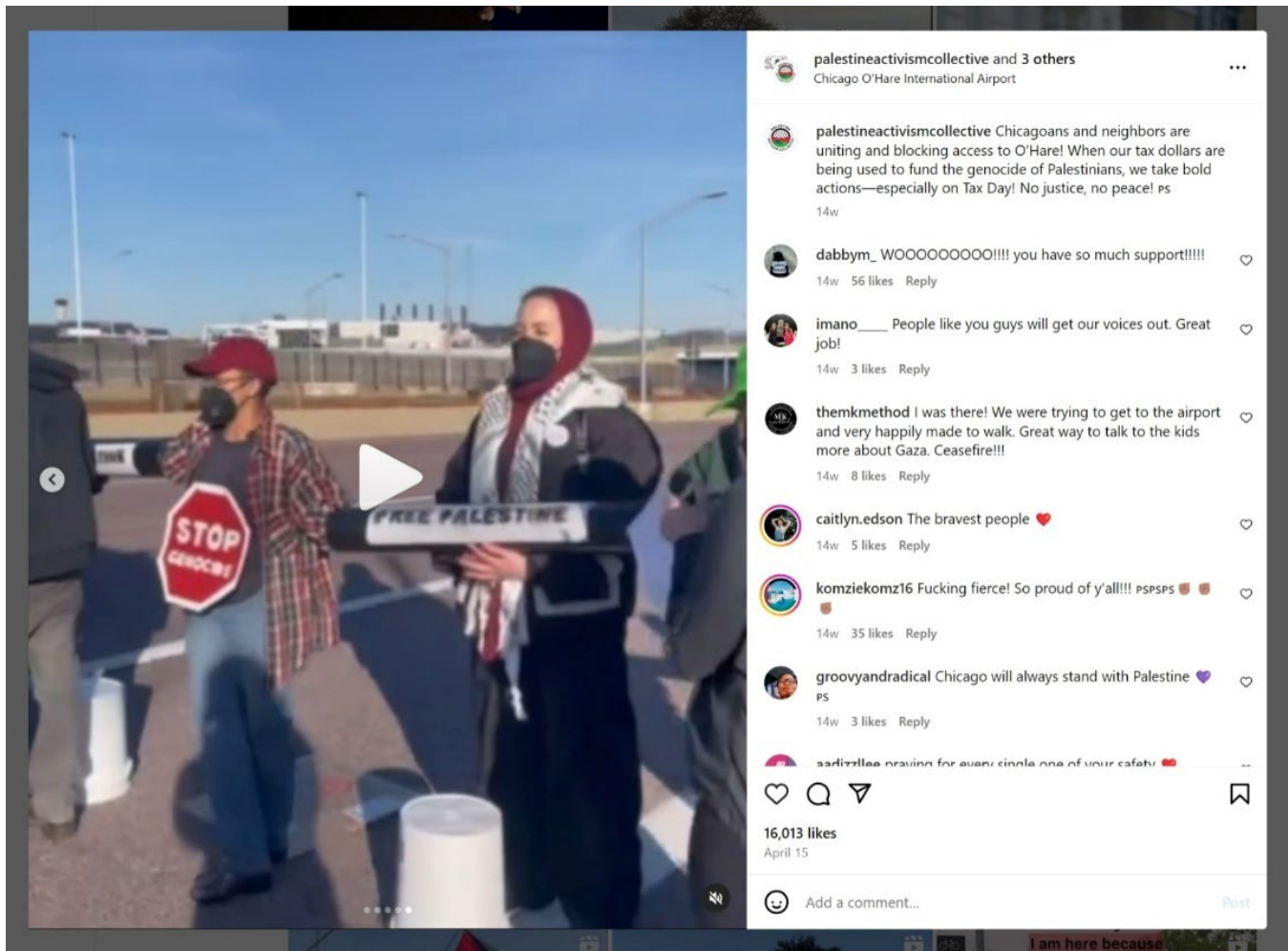
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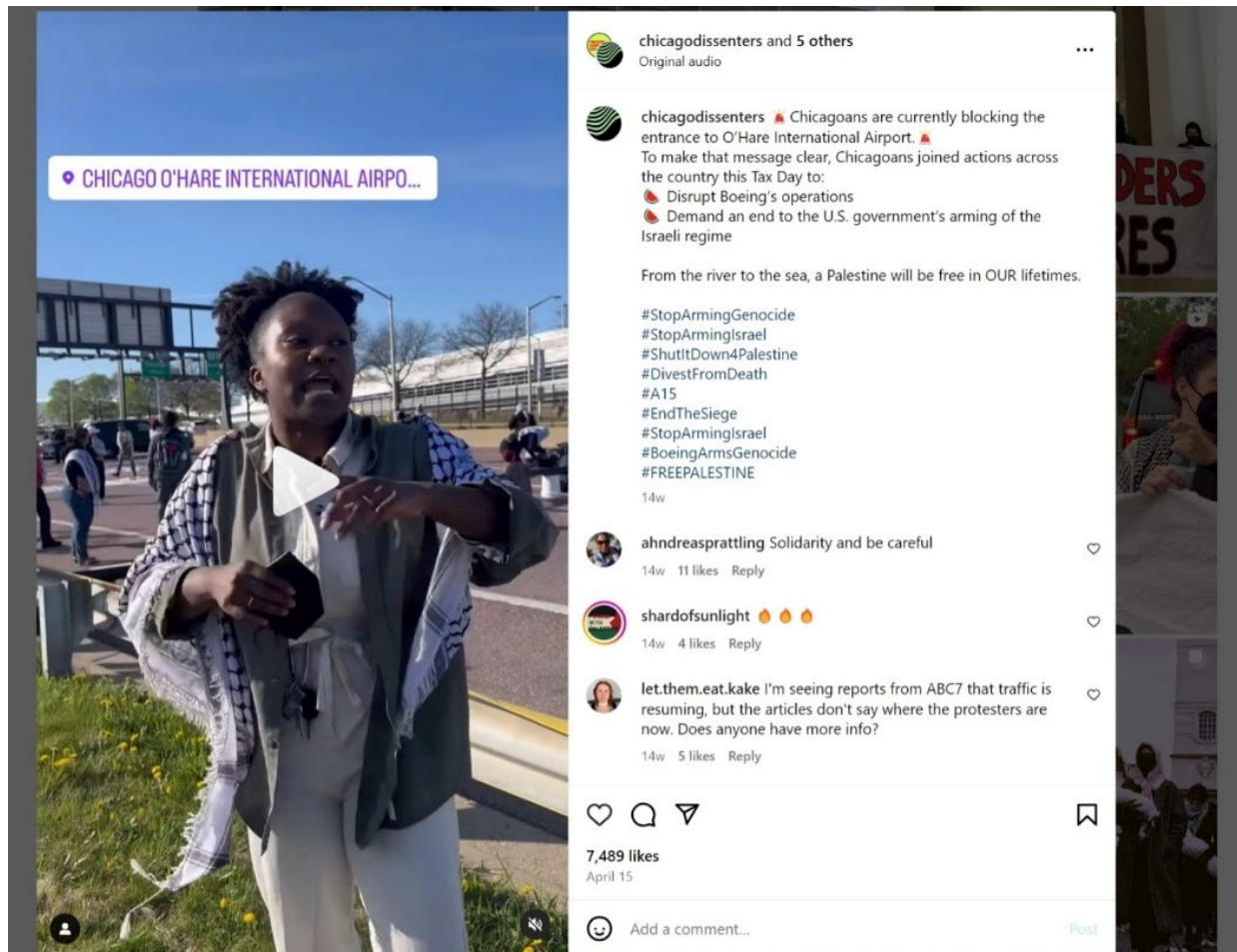
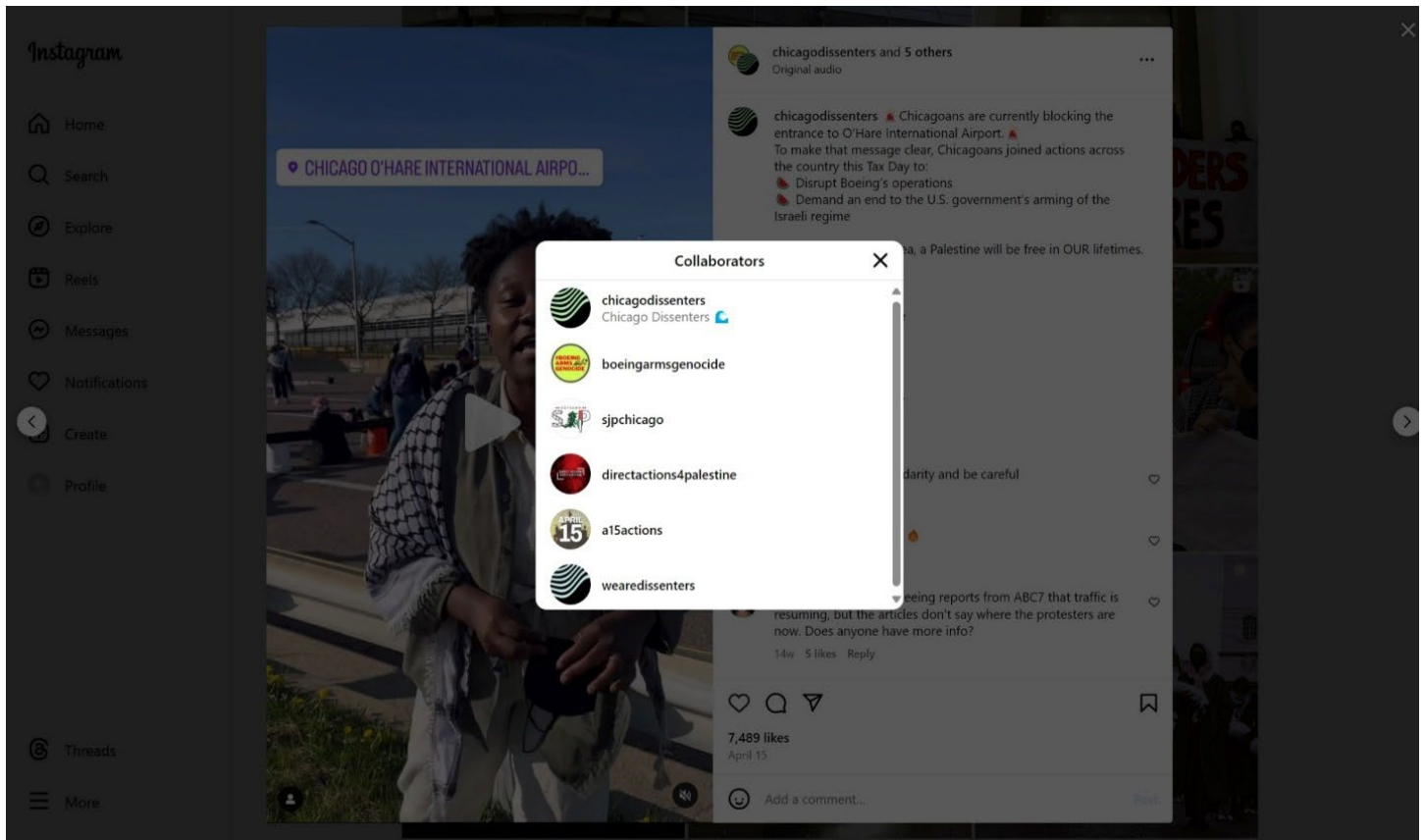
🔖 ↗

# EXHIBIT 20









chicagodissenters and a15actions  
Original audio

chicagodissenters 🚨 HAPPENING NOW 🚨 Travelers are walking to their gates as drivers are prevented from entering the drop-off site for all domestic terminals 1-3 at O'Hare, stopping travelers from reaching their flights.

ON THIS TAX DAY, THERE WILL BE NO BUSINESS AS USUAL WHILE GAZANS ARE DYING

#stoparminggenocide  
#StopArmingIsrael  
#ShutItDown4Palestine  
#DivestFromDeath  
#A15  
#EndTheSiege  
#StopArmingIsrael  
#BoeingArmsGenocide  
#FREEPALESTINE

14,913 likes  
April 15

Add a comment... Post

directactions4palestine and a15actions  
Original audio

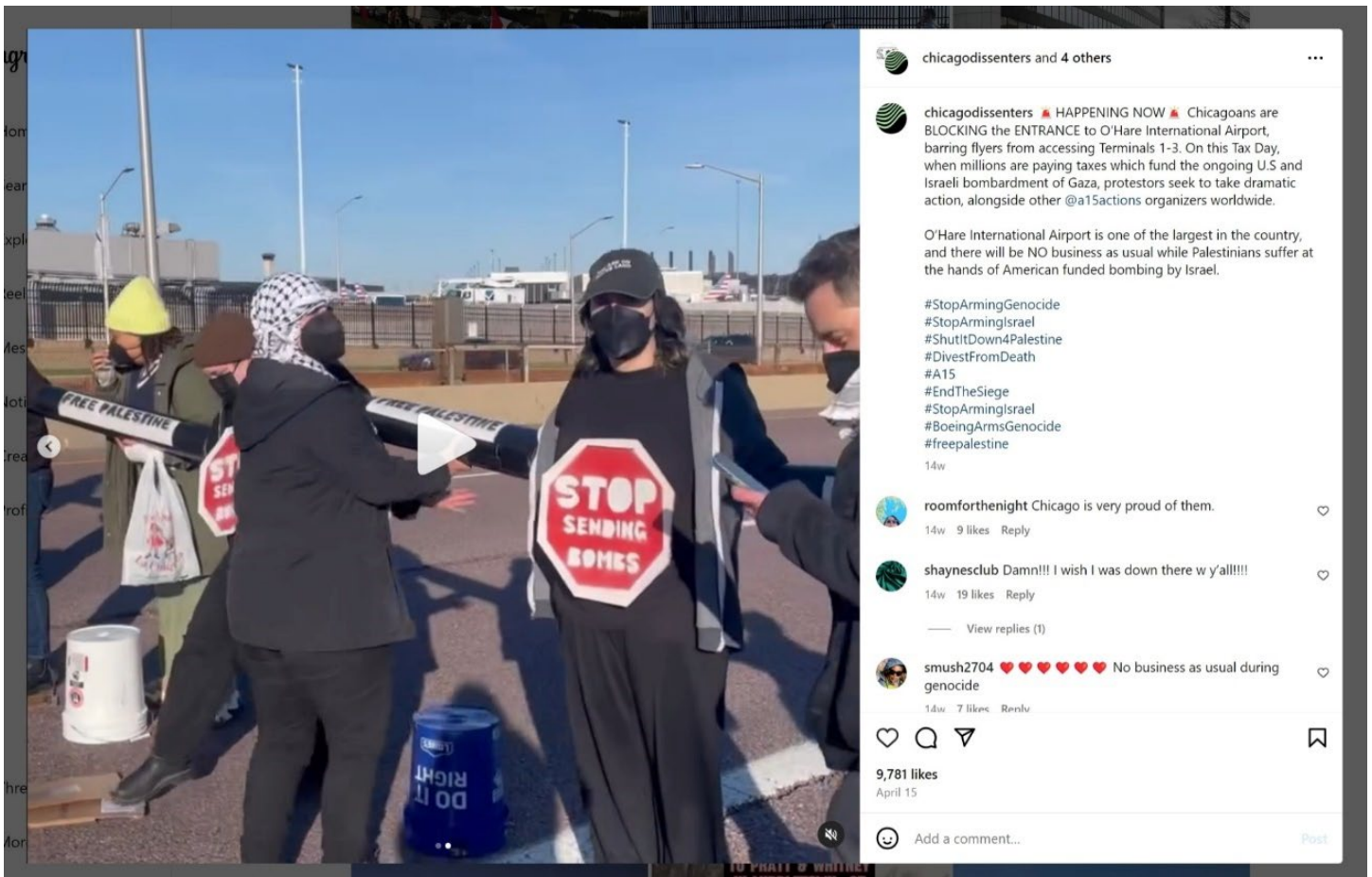
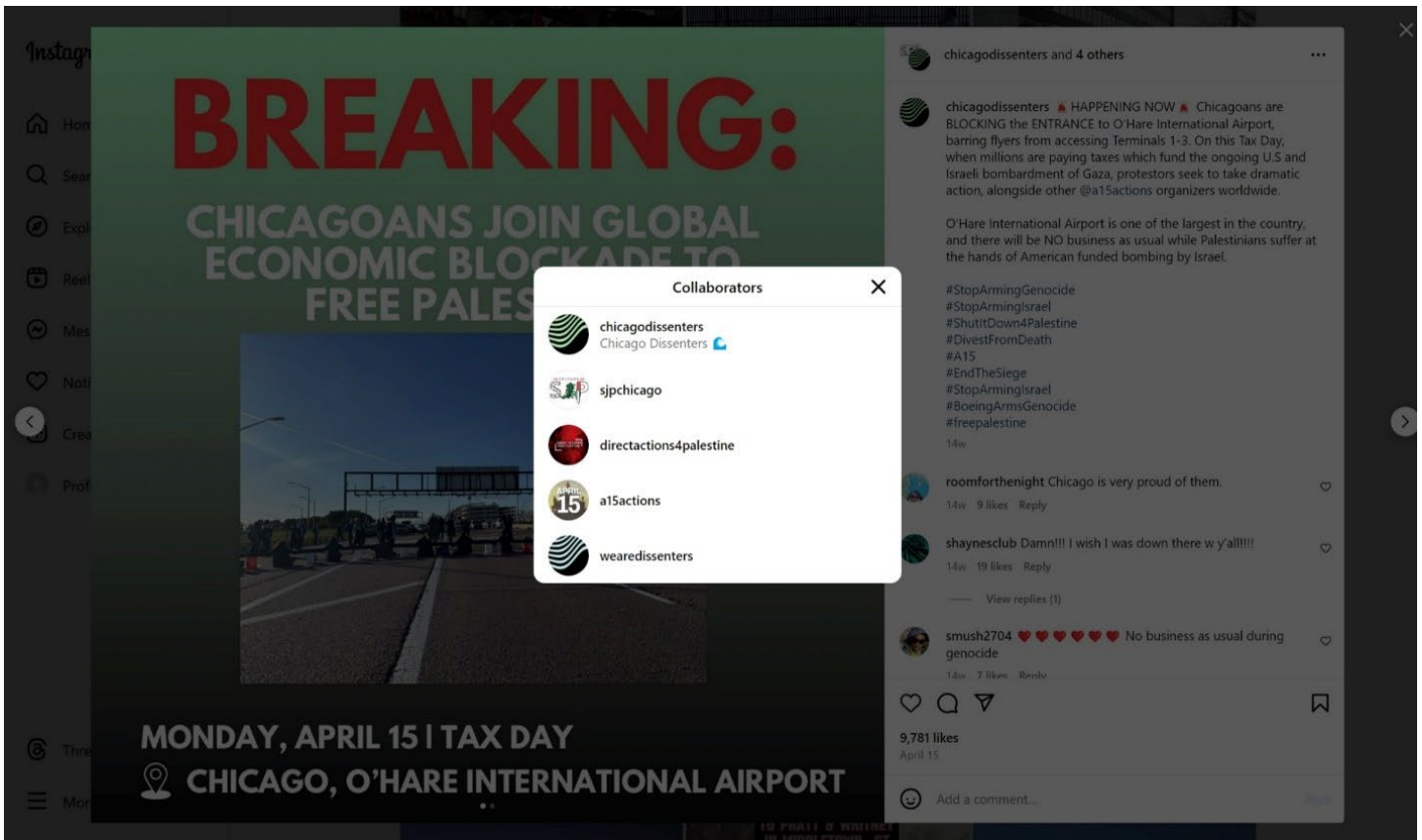
directactions4palestine Copy: 🚨 HAPPENING NOW 🚨 Chicagoans are BLOCKING the ENTRANCE to O'Hare International Airport, barring flyers from accessing Terminals 1-3. On this Tax Day, when millions are paying taxes which fund the ongoing U.S and Israeli bombardment of Gaza, protestors seek to take dramatic action, alongside other @A15actions organizers worldwide.

4w

unfav.andres y'all are braindead if you think i'm prioritizing the lives of people on the other side of the world before mine. i support the movement, i support stopping the war, and i support stopping the genocide on BOTH sides. what i don't support is having someone block the road for my flight that i PAID for to go see my family one last time before i have to fight another stupid war i don't want to get involved in. i get that there needs to be action and there needs to be change, but this

12,523 likes  
April 15

Add a comment... Post



# **EXHIBIT 21**

**A LETTER TO MAYOR BRANDON JOHNSON FROM THE O'HARE 40**

**WE WILL BE IN THESE STREETS GENOCIDE**

take action to support the right to protest in chicago  
at [bit.ly/ohare40](https://bit.ly/ohare40)

**Collaborators**

- chicagodissenters Chicago Dissenters
- a15actions
- sjpchicago
- wearedissenters
- shirien.create
- directactions4palestine

chicagodissenters and 5 others

chicagodissenters A Letter to the Mayor (sent July 2, 2024)  
bit.ly/ohare40

Dear Mayor Johnson,

We are writing to urge you to drop the City's charges against the "O'Hare 40". We believe that the City's Law Department pressing criminal misdemeanor charges of obstructing traffic—even after the State's Attorney has dropped their charges—is an excessive response to non-violent protest and civil disobedience.

The frustration and anger of the Palestinian people has reached a boiling point, and several protesters, from Palest1nian, Arab, Black, Muslim, Jewish and Anishinaabe communities, hold deep connections to the cause, with loved ones and family members impacted, and deep reverence for indigenous communities everywhere.

Following the radical tradition of civil disobedience in Chicago, from the Woodlawn mental health clinic occupation of 2012 to the Dyett hunger strike of 2015 (that you participated in !), we believe in the power of direct action when no other tactics work meaningfully. We exercised our First Amendment rights and participated in non-violent protest. No flights were cancelled as a result of this protest on Tax Day, merely some travelers inconvenienced, while Gazans face a vastly different inconvenient reality: American taxpayer funded gen0cide.

Targeting us will only further isolate liberation movements. Additionally, prosecuting and convicting the O'Hare 40 and all

1,467 likes  
July 19

Add a comment...

**A LETTER TO MAYOR BRANDON JOHNSON FROM THE O'HARE 40**

**WE WILL BE IN THESE STREETS GENOCIDE**

take action to support the right to protest in chicago  
at [bit.ly/ohare40](https://bit.ly/ohare40)

**Collaborators**

- chicagodissenters Chicago Dissenters
- a15actions
- sjpchicago
- wearedissenters
- shirien.create
- directactions4palestine

chicagodissenters and 5 others

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We are writing to urge you to drop the City's charges against the "O'Hare 40". We believe that the City's Law Department pressing criminal misdemeanor charges of obstructing traffic—even after the State's Attorney has dropped their charges—is an excessive response to non-violent protest and civil disobedience.

The frustration and anger of the Palestinian people has reached a boiling point, and several protesters, from Palest1nian, Arab, Black, Muslim, Jewish and Anishinaabe communities, hold deep connections to the cause, with loved ones and family members impacted, and deep reverence for indigenous communities everywhere.

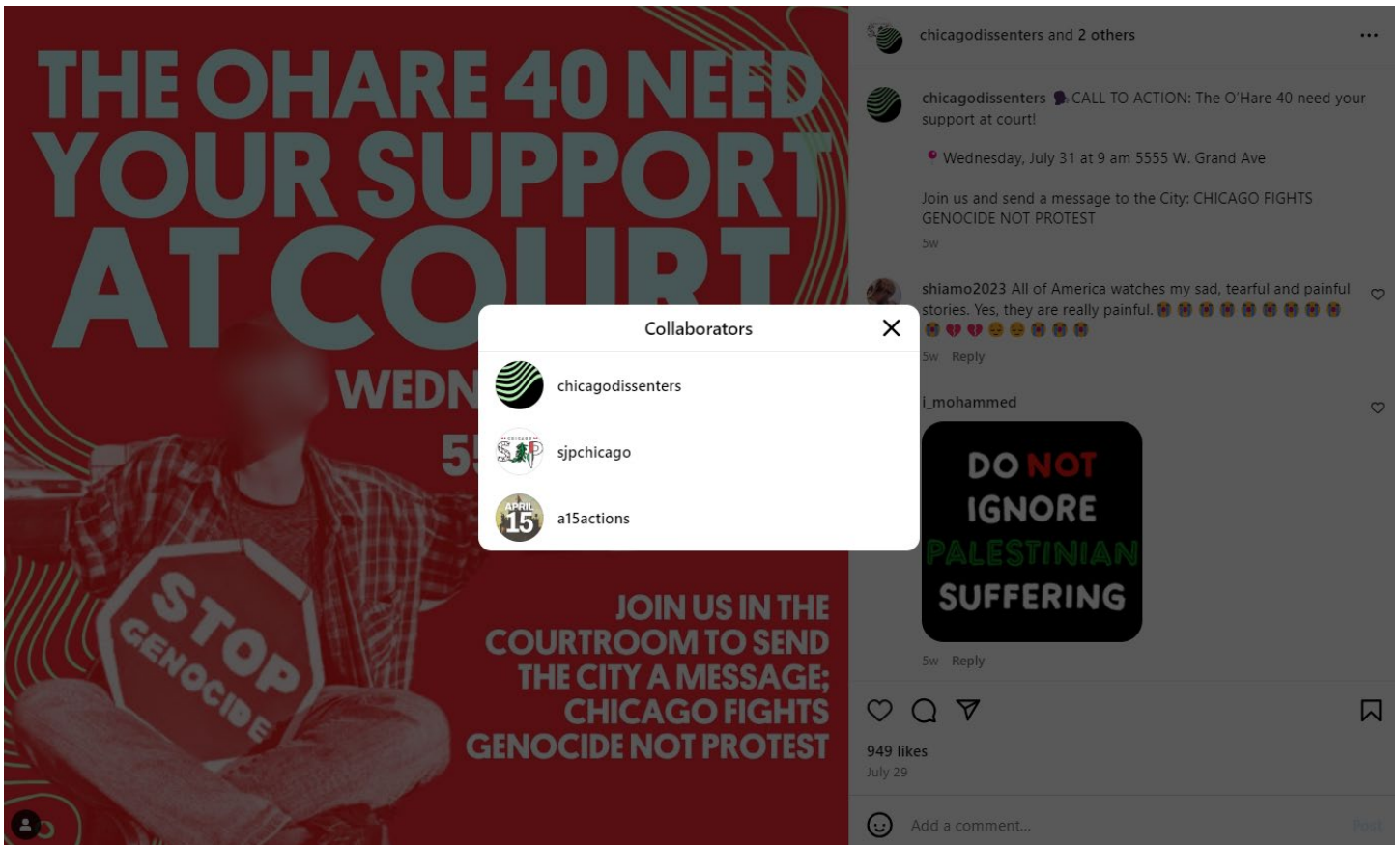
Following the radical tradition of civil disobedience in Chicago, from the Woodlawn mental health clinic occupation of 2012 to the Dyett hunger strike of 2015 (that you participated in !), we believe in the power of direct action when no other tactics work meaningfully. We exercised our First Amendment rights and participated in non-violent protest. No flights were cancelled as a result of this protest on Tax Day, merely some travelers inconvenienced, while Gazans face a vastly different inconvenient reality: American taxpayer funded gen0cide.

Targeting us will only further isolate liberation movements. Additionally, prosecuting and convicting the O'Hare 40 and all

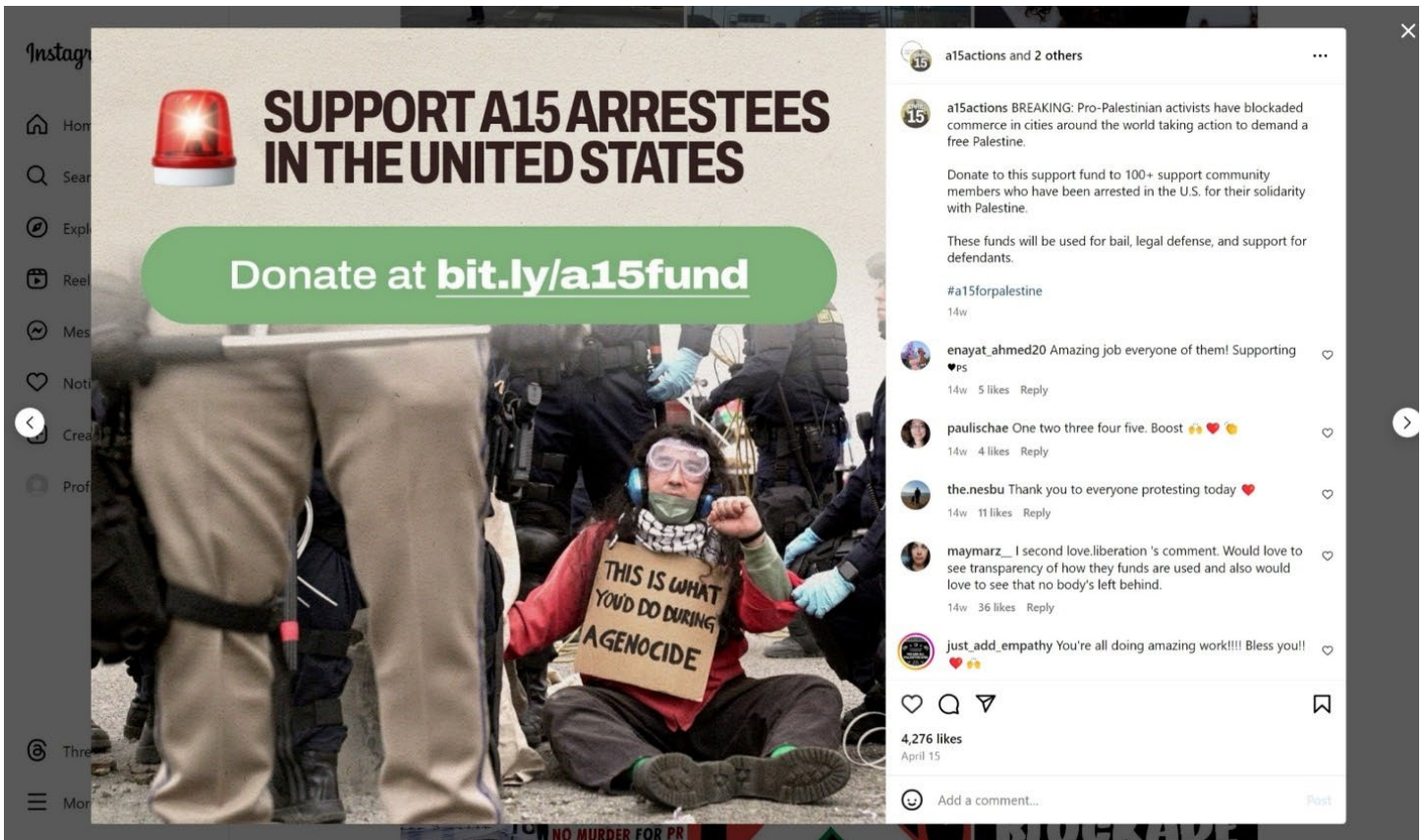
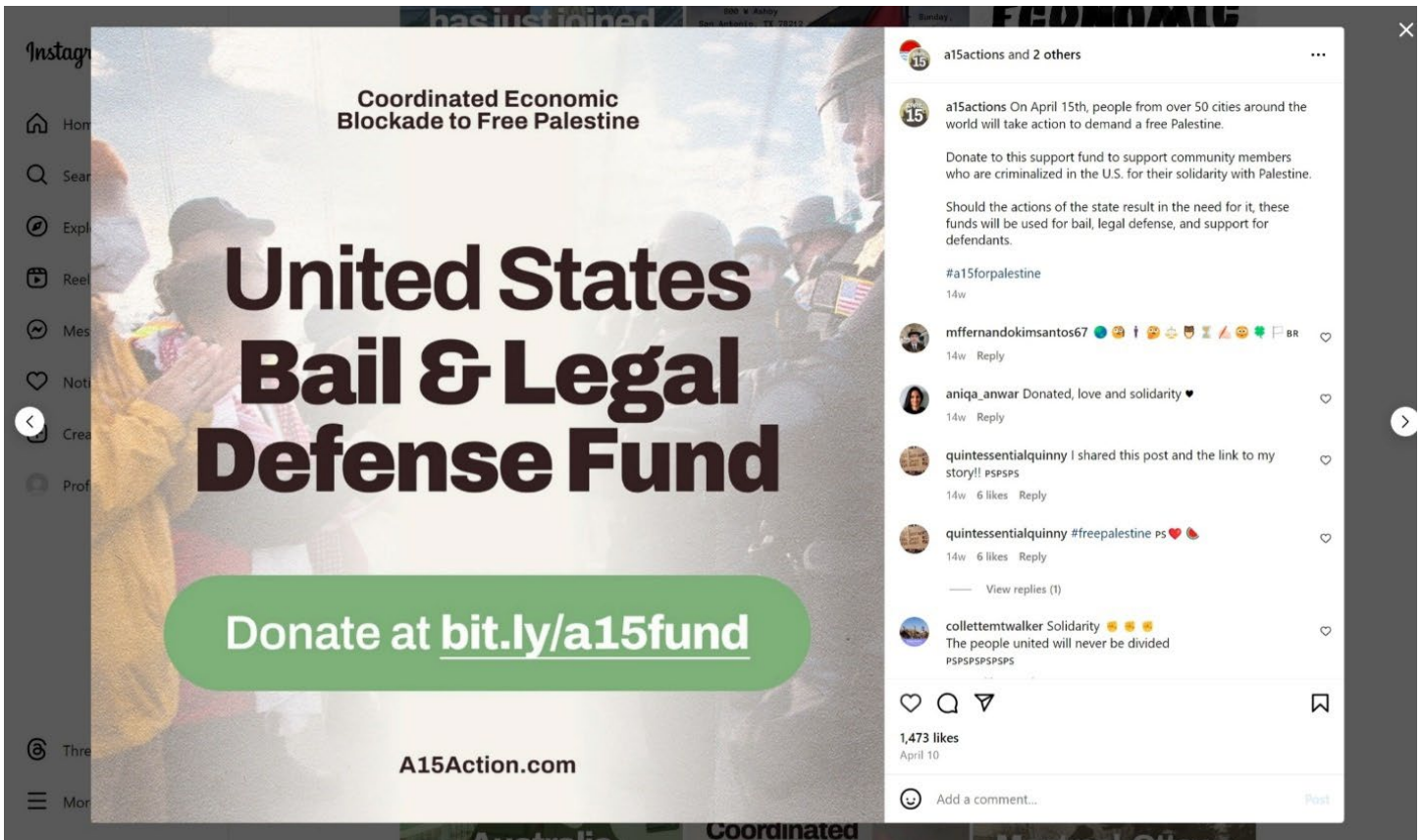
1,467 likes  
July 19

Add a comment...

# EXHIBIT 22



# **EXHIBIT 23**



# EXHIBIT 24

**CALL-IN TO DEMAND RELEASE OF 40 O'HARE PROTESTORS!**

Call and demand the 25th district police station release all of the protestors!

**Call: (312) 746-8605**

#A15Action #FreePalestine

**Collaborators**

- directactions4palestine  
Direct Actions for Palestine
- uscpr
- a15actions

directactions4palestine and 2 others

directactions4palestine 🚨 URGENT JAIL SUPPORT NEEDED 🚨

40 protestors have been arrested at O'Hare International Airport in IL and are being held in the 25th district police station.

CALL AND DEMAND THEIR RELEASE: (312) 746- 8605

PALESTINE WILL BE FREE!

#A15Action

20w

lemurs\_man The guy who answered had a very soft voice. He asked if there was anything else he could help me with lol

30w 30 likes Reply

meggriffes Let's confuse the algo 🌶️ describe your perfect/dream pet (whether you have it yet, or not)

30w 88 likes Reply

View replies (30)

2natown\_ I just called and only got a dial tone??? Is that from all the calls or is their line off the hook now?

20w 7 likes Reply

View replies (1)

8,608 likes

April 15

Add a comment...

**CALL-IN TO DEMAND RELEASE OF 40 O'HARE PROTESTORS!**

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**Call: (312) 746-8605**

#A15Action #FreePalestine

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20w 88 likes Reply

View replies (30)

2natown\_ I just called and only got a dial tone??? Is that from all the calls or is their line off the hook now?

20w 7 likes Reply

View replies (1)

8,608 likes

April 15

Add a comment...

# **EXHIBIT 25**



About  
Get Involved  
Contact Us  
Media



NSJP National Conference, 2018 (UCLA)

## WHO ARE WE?

### OUR PURPOSE

#### *Our Unique Role within the Movement*

Building on the legacy & impact of the student movement in occupied Turtle Island (U.S. and Canada), National Students for Justice in Palestine (National SJP) seeks to empower, unify, and support student organizers as they push forward demands for Palestinian liberation & self-determination on their campuses.

The student movement for the liberation of Palestine first began in the 1950s through the formation of the General Union of Palestinian Students (GUPS). From the U.S. to Palestine, GUPS chapters galvanized thousands of students towards a liberated Palestine. The 90s' wave of corrupt politicians and faulty deals changed the liberation movement as we knew it and many institutions, including the student movement, collapsed. In the absence of a Palestinian student movement, organizations such as Students for Justice in Palestine emerged across occupied Turtle Island (U.S. and Canada) as a way to educate, advocate, and mobilize in support for Palestinian liberation.

Nearly two decades after the formation of the first Students for Justice in Palestine, the movement for Palestine has taken colleges and universities across North America by storm. With over 200 campus Palestine solidarity organizations across the continent, students have been leaders in uplifting demands for freedom, justice, and equality for the Palestinian people.

As momentum for Palestine solidarity builds, the need for organizational cohesion and a shared political framework is vital to building and sustaining the Palestine solidarity movement on campus. Combating the increasingly violent attempts to scare Palestine solidarity organizers into silence requires a strong, unified student movement that is able to build and leverage power in the face of repression and pushback.

### OUR MISSION

### OUR VISION

### OUR VALUES



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# **EXHIBIT 26**

HOME

ABOUT THE PALESTINE PROGRAM

DONATE

CONTACT US

REGISTER FOR USSF

SJP NATIONAL CONVENTION

USSF BLOG

ANOTHER WORLD IS POSSIBLE  
ANOTHER US IS NECESSARY

**US SOCIAL FORUM**  
JUNE 22-26, 2010 DETROIT, MI  
**PALESTINE PROGRAM**

Follow the Palestine Program online at the **USSF Palestine Program Blog!**

To contribute your experiences and entries to the blog, email **ussfblog@palestineconference.org**.

Follow us on **Twitter @uspcn!**  
Also follow Electronic Intifada **@intifadaLive**

## Palestine Program

Workshops  
People's Movement Assemblies  
Plenary Speaker  
Palestine Tent  
SJP National Convention  
US Assembly of Jews Confronting Racism and Israeli Apartheid  
Solidarity Mural  
Support the Palestine Program  
Register for Space in Palestine Tent  
Sponsors and Donors  
Links and Resources  
USSF Blog  
Downloadable Palestine Program PDF  
Boycott, Divestment and Sanctions (BDS) FAQ  
PDF Poster  
Facebook  
USSF main site  
Register for USSF  
USPCN main site

## USSF Blog

USSF Synthesis PMA supports BDS, condemns Zionism as racism  
United Against Racism  
PMA Resolution from the USSF

## STUDENTS FOR JUSTICE IN PALESTINE NATIONAL CONVENTION 2010

Hotel St. Regis - 3071 West Grand Boulevard, Detroit, MI 48202

Wednesday, June 23<sup>rd</sup>—Thursday, June 24<sup>th</sup>, 2010

American Muslims for Palestine is facilitating the national convening of Students for Justice in Palestine chapters in the US. In the past decade, student activism on Palestine has grown exponentially, and continues to expand and intensify rapidly. The convention is part of the Palestine Program of the US Social Forum, and as such hopes to facilitate student involvement with other social justice movements in the US, particularly campus and student organizers and campaigners. This convention aims to be a convergence of the growing collaborative work across SJP chapters, strengthening our collective organizing, and offering each other support in local and campus political activism. It will be an interactive and dynamic conversation aimed at empowering and building capacities. Together, we can seed divestment on every campus, educate our fellow students, and build meaningful relationships with social justice movements across all our campuses.

Speakers include Hatem Bazian, Julia Salameh, and student representatives from university divestment campaigns across the country.

ALL SJP members are invited to attend this convention.

**Wednesday, June 23, 2010**

**11am – 2pm**

### Session One- Introduction to SJP work on campuses

- Forming an SJP and gathering support for your SJP
- Establishing points of unity
- Creative tactics for Palestine education on campus
- Solidarity with allies across social justice movements
- The matter of "dialogue"
- Setting goals and building long-term sustainability

**3:30pm – 6:00 pm**

### Session Two- Raising Campus Awareness

- Alliances and Solidarity-building
  - Establishing and initiating alliances with campus organizations and campaigns
  - Key organizations and campaigns and "natural" allies
- Sustaining a critical mass with:
  - Student body
  - Board members, Faculty, staff, unionized workers
  - Alumni, graduate students, professionals

BDS Resolution from the  
US Social Forum  
USSF People's Movement  
Assembly Video  
Interview with Haithem El-  
Zabri of  
PalestineOnlineStore at  
USSF  
Arab American News on  
Arab participation and  
joint solidarity  
Report from Palestinian  
Solidarity: Past Present  
and Future workshop  
New Free Speech TV  
Interviews with Ziad  
Abbas and Ann Wright  
Jamal Juma' at Thursday  
evening plenary  
New Self-Organized  
Panel on Palestinian  
Political Prisoners!

iv. Local political and social establishment

**Thursday, June 24<sup>th</sup>, 2010**

**10:30 am – 1:30 pm**

**Session Three- Experiences in University Divestment**

Student representatives will discuss the lessons learned, and ways forward in their divestment campaigns:

- a) Hampshire College
- b) University of Michigan-Dearborn
- c) University of California at Berkeley
- d) Evergreen State
- e) Brown University
- f) University of Arizona
- g) University of California-San Diego

**2:30 – 5pm**

**Session Four- Launching BDS/divestment campaigns on campus**

- a) Strategies and tactics for shaping the campaign
  - i. Preparations and structures for BDS organizing
  - ii. Campus media access and utilization
- b) Strengthening and intensifying connections with student governments and unions
- c) Building sustainable divestment campaign infrastructure
- d) Developing and implementing a research profile on university investments

**Session Five- Establishing and Setting a National Calendar for SJPs**

- i. National Coordinated Actions
- ii. Israeli Apartheid Week
- iii. National Support for Divestments
- iv. Expansion and solidifying of Students for Justice in Palestine-National

All SJP National Convention attendees should attend the Thursday, June 24th, 2010 evening plenary, 6:30-9pm at Cobo Hall, featuring Jamal Juma, BNC co-founder and Palestinian grassroots anti-apartheid wall leader, live from Palestine.

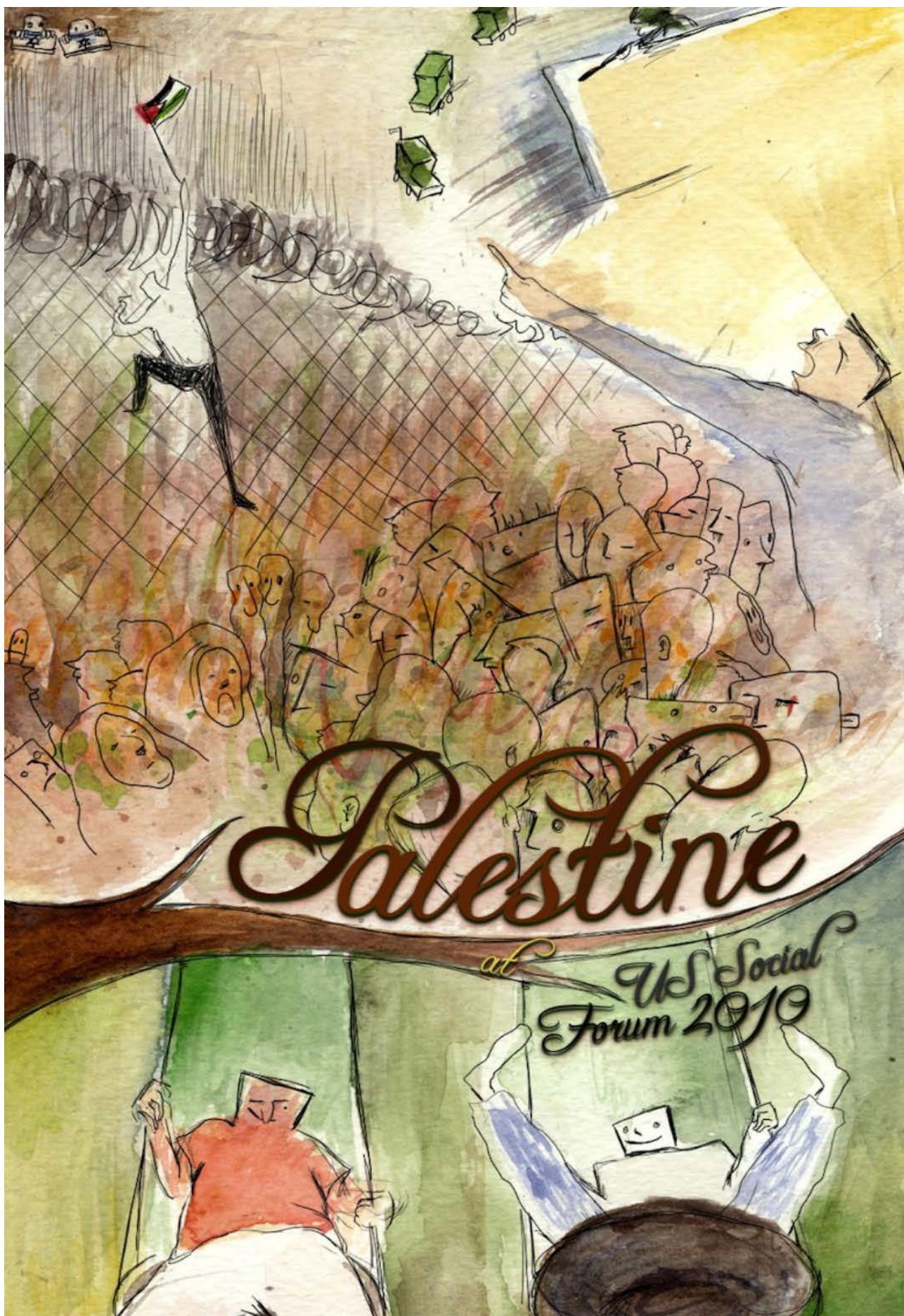
SJP members are strongly encouraged to attend workshops, PMAs, and other events throughout the US Social Forum when the Convention is not in session. They should especially attend the People's Movement Assembly on BDS on Friday, June 25th, from 1-5:30pm at Cobo Hall: O3-46. This will be the major session on BDS organizing nationally.

The Program Book for the US Social Forum can be seen here: <http://www.ussf2010.org/programbook>

For access to any US Social Forum activities, all SJP attendees must register online at <http://www.ussf2010.org/register> or onsite in Cobo Hall.

To register and for further questions:

Contact: Awad Hamdan, [awad.hamdan@palestine.org](mailto:awad.hamdan@palestine.org), 773.951.2020



**ARTWORK & DESIGN BY**

{ Cover Art—Front & Back }

EMILY HENOCHOWICZ

Emily is a 21-year old art student from Maryland.

[thirstypixels.blogspot.com](http://thirstypixels.blogspot.com)

{ Program }

NAMIRA ISLAM

Namira is a 22-year old law student from Michigan.

[namiraislam.daportfolio.com](http://namiraislam.daportfolio.com)

**U.S. SOCIAL FORUM**

DETROIT, MI

June 22<sup>nd</sup>—June 26<sup>th</sup> . 2010

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AMP calls on Students for Justice in Palestine chapters to come together as

# SJP NATIONAL

SJP National seeks to . . .

1. Unite the work for Palestine on campuses throughout the United States
2. Offer support to your SJP
3. Share resources, experience and knowledge
4. Help you organize events and find speakers
5. Help facilitate divestment campaigns on your campus

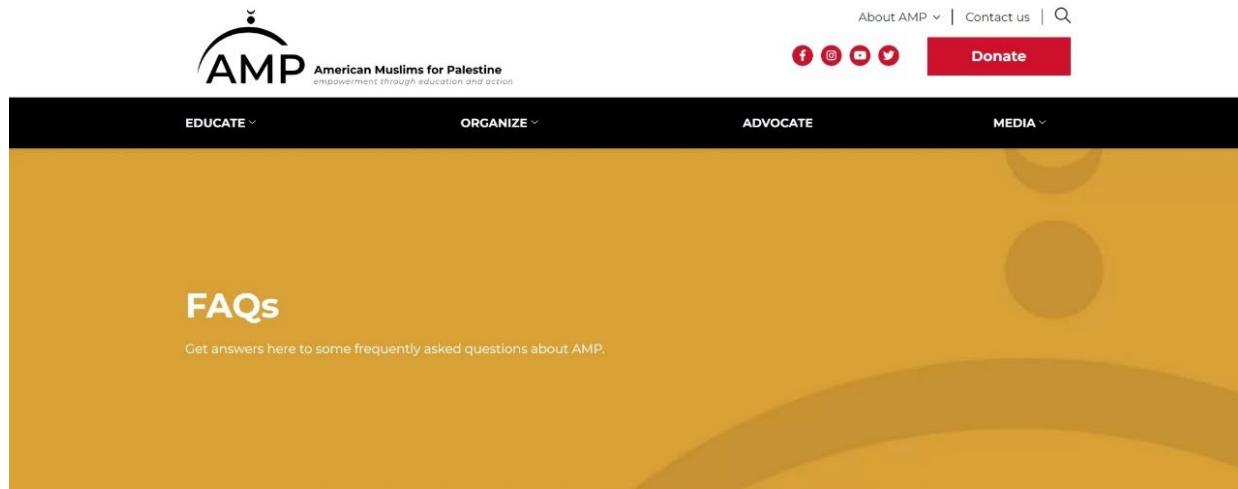
For more information, email [info@sjpnational.org](mailto:info@sjpnational.org) or call 738.598.4267 ext. 21



AMERICAN MUSLIMS FOR PALESTINE

[www.ampalestine.org](http://www.ampalestine.org)

# EXHIBIT 27



What is AMP?



When was AMP formed?



What is AMP's mission?



What does AMP do?



AMP educates the public and the media by holding educational events, such as lectures, workshops and trainings. We also publish high-quality educational materials, which we distribute for free to politicians, journalists, students and the public at large. We also work in broad-based coalitions and support campus activism through Students for Justice in Palestine and Muslim Student Associations.

Who funds AMP?



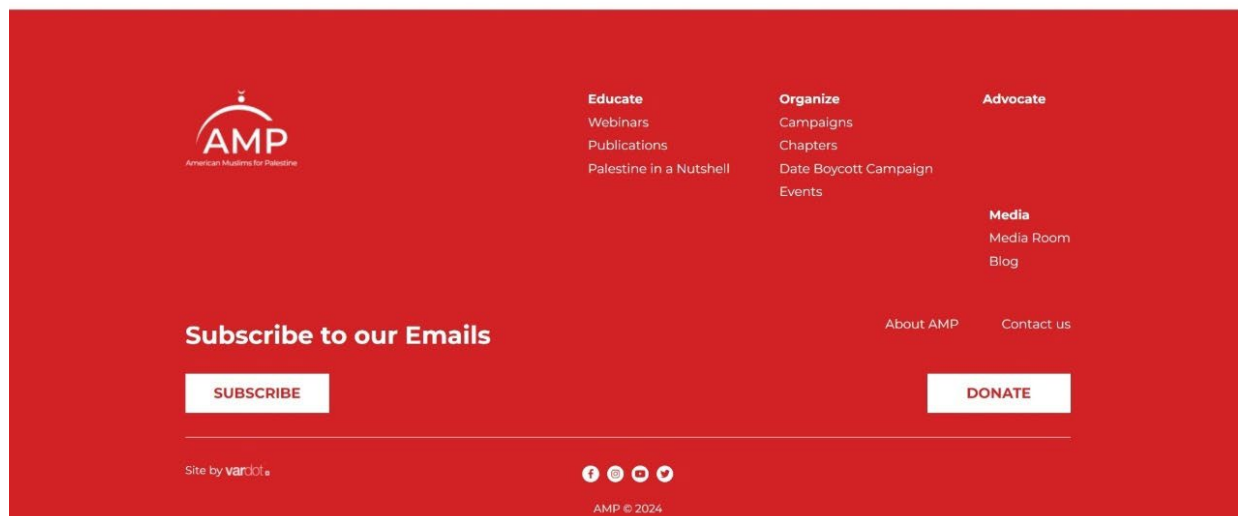
Are donations to AMP tax exempt?



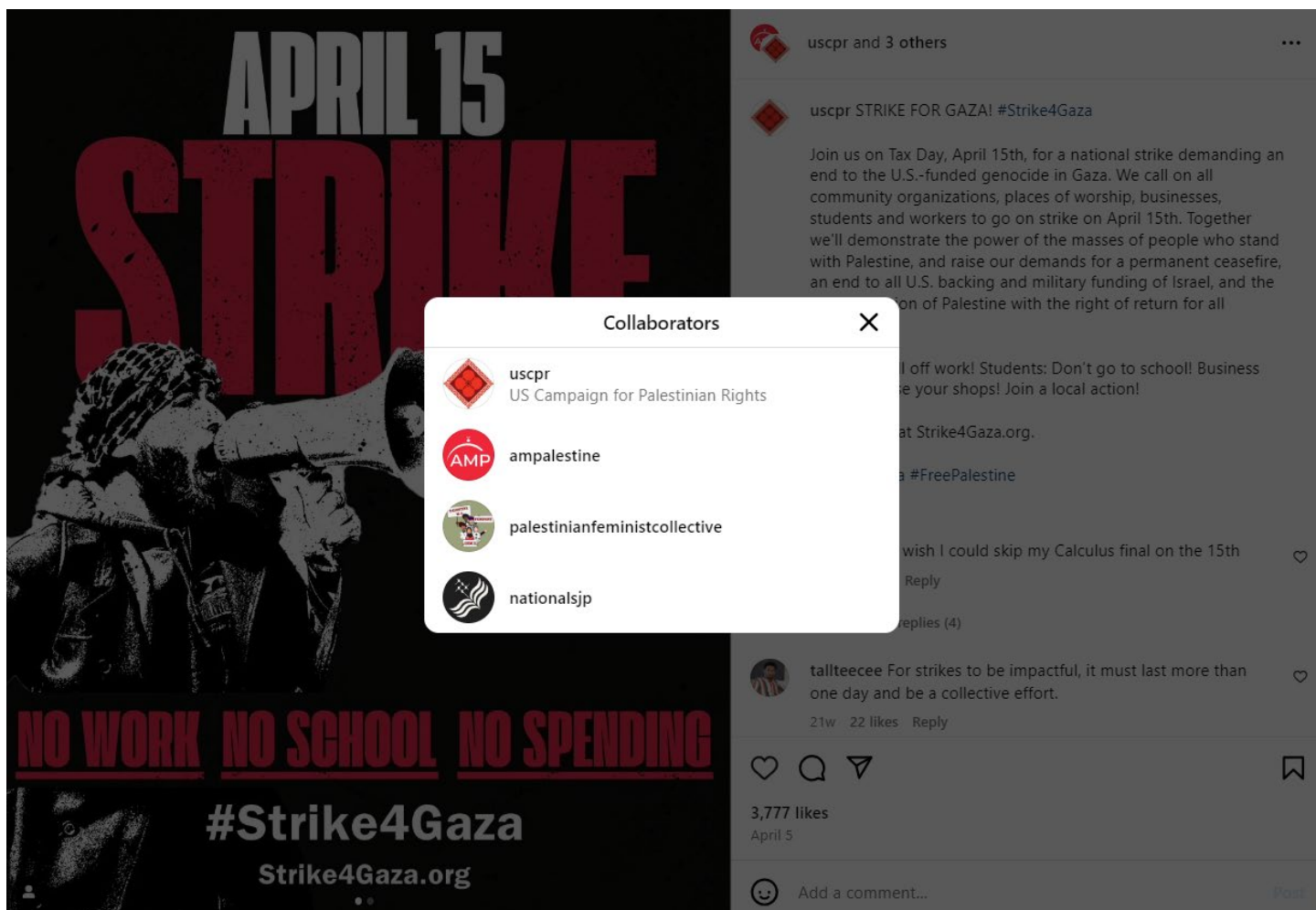
How can I get involved with AMP?

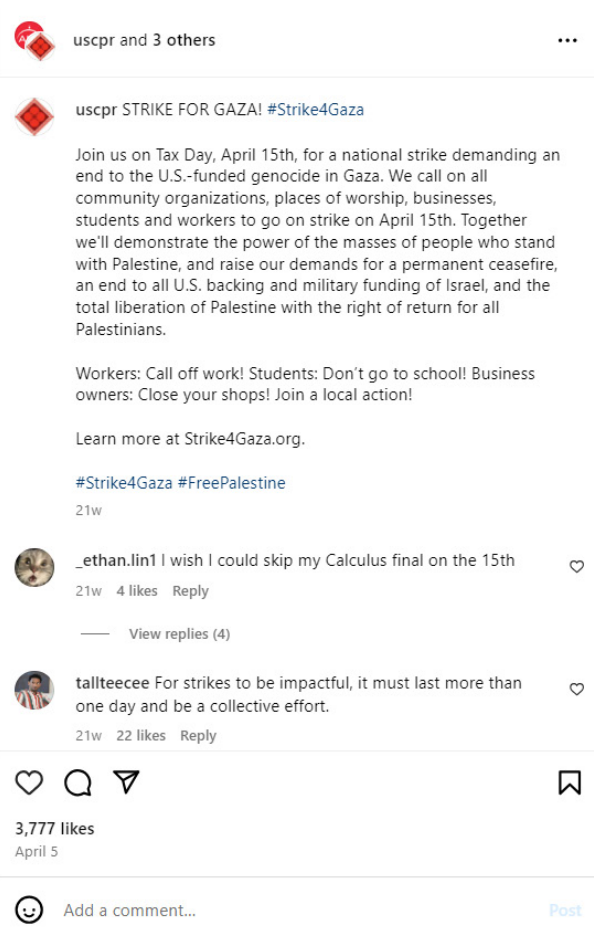
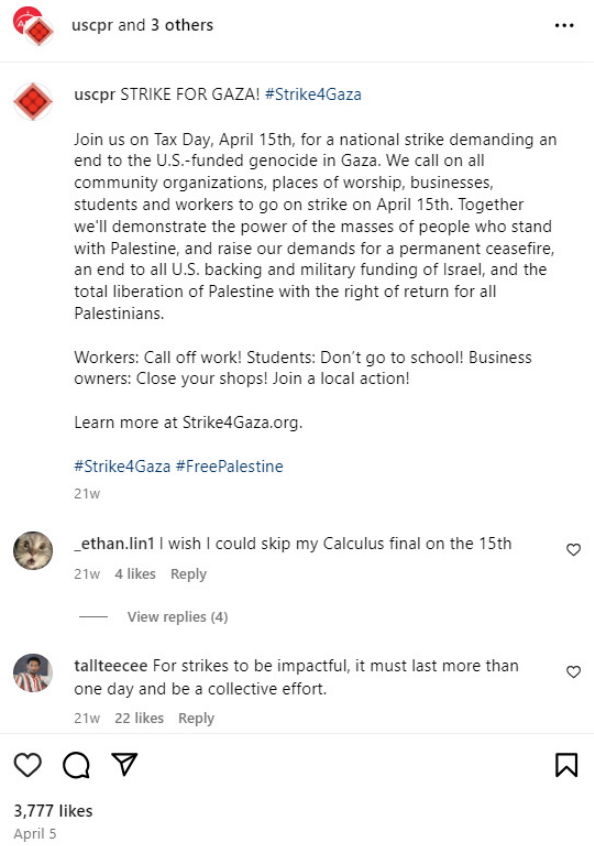
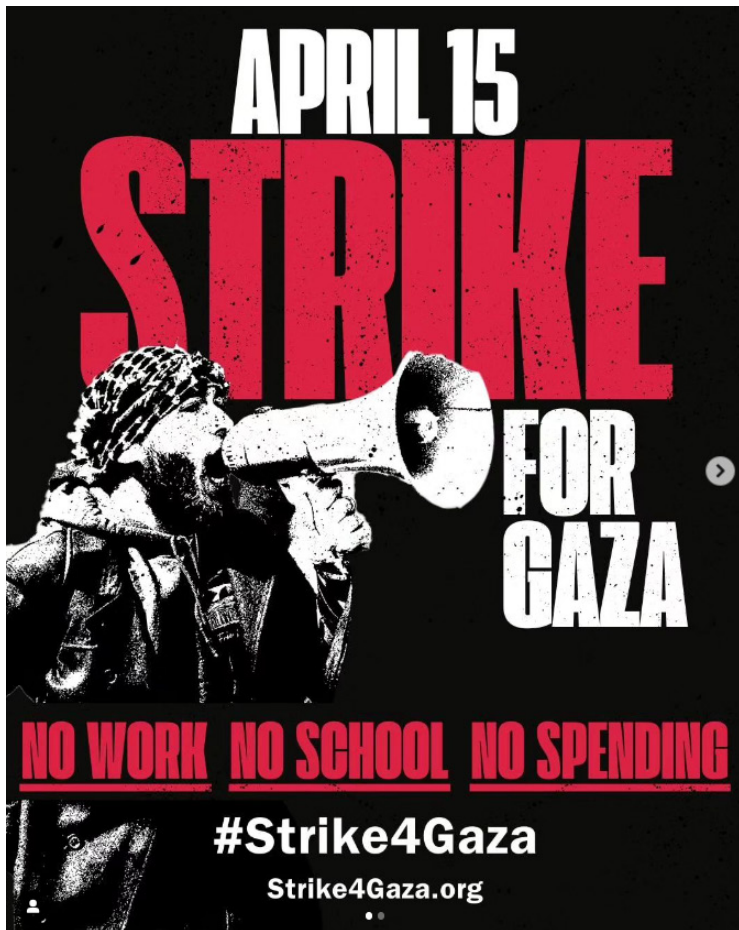


Can I open my own AMP chapter?



# EXHIBIT 28





# EXHIBIT 29

As NSJP's main fiscal sponsor, WESPAC is largely responsible for its activities, while providing it with a legitimate façade for its actions.

WESPAC serves as a "fiscal sponsor" for the following organizations:<sup>211</sup>

1. National Students for Justice in Palestine (NSJP)
2. US Palestinian Community Network (USPCN)
3. Palestinian Youth Movement (PYM)
4. Adalah New York
5. International Jewish Anti-Zionist Network (IJAN)
6. Palestine Freedom Project (PFP)

The screenshot shows a donation page for National Students for Justice in Palestine (NSJP). The page has a red sidebar on the left with links: About, Get Involved, Contact Us, Media, and a large red button labeled "DONATE!". The main content area is white and features a large heading "DONATE TO NATIONAL SJP TODAY!". Below this is a donation form. The "Amount" section has buttons for \$20, \$50 (selected), \$100, and \$500. A large "\$ 50" is displayed. Below the amount is a checkbox for "MONTHLY". The "Your Information" section includes fields for Full Name, Email, and Phone. The "Payment Information" section includes a field for the card number (partially obscured), MM / YY, and CVC. A checkbox is checked, stating "I'd like to cover the transaction fee so more of my donation goes to Wespac Foundation Inc.". Below this is a reCAPTCHA "I'm not a robot" checkbox. A green button labeled "Donate \$51.50" is visible, with a smaller "Donate Now" button below it. A small image of a person in a red shirt with "STUDENTS FOR JUSTICE IN PALESTINE" on the back is shown on the right. Text on the right explains that NSJP supports over two hundred Palestine solidarity organizations and that all donations are tax-deductible.

**"I'd like to cover the transaction fee so more of my donation goes to WESPAC Foundation Inc."**<sup>212</sup>

**Figure 22:** NSJP's donations go to Wespac Foundation Inc.<sup>213</sup>

From Institute for the Study of Global Antisemitism & Policy, *National Students for Justice in Palestine (NSJP): Antisemitism, Anti-Americanism, Violent Extremism and the Threat to North American Universities*, (2024) (available at [isgap.org/follow-the-money/](https://isgap.org/follow-the-money/)).

# **EXHIBIT 30**



About  
Get Involved  
Contact Us  
Media

## NATIONAL STUDENTS FOR JUSTICE IN PALESTINE

Supporting over 350 Palestine solidarity organizations across occupied Turtle Island ("North America"), we aim to develop a student movement that is **connected, disciplined, and equipped** with the tools necessary achieve **Palestinian liberation**.

### POPULAR UNIVERSITY FOR GAZA SOLIDARITY ENCAMPMENTS



See full screen

# EXHIBIT 31



sjpchicago

Follow

Message

...

800 posts

35.4K followers

234 following

SJP Chicago

Cause

A unified front of Chicagoland SJPs, supporting &amp; uplifting one another in the struggle for Palestinian liberation... more

[linktr.ee/sjpchicago](https://linktr.ee/sjpchicago) + 2

7/4us



6/22



Buckingham ...



UChi



5/29/24 ps



PCFP '24



2024

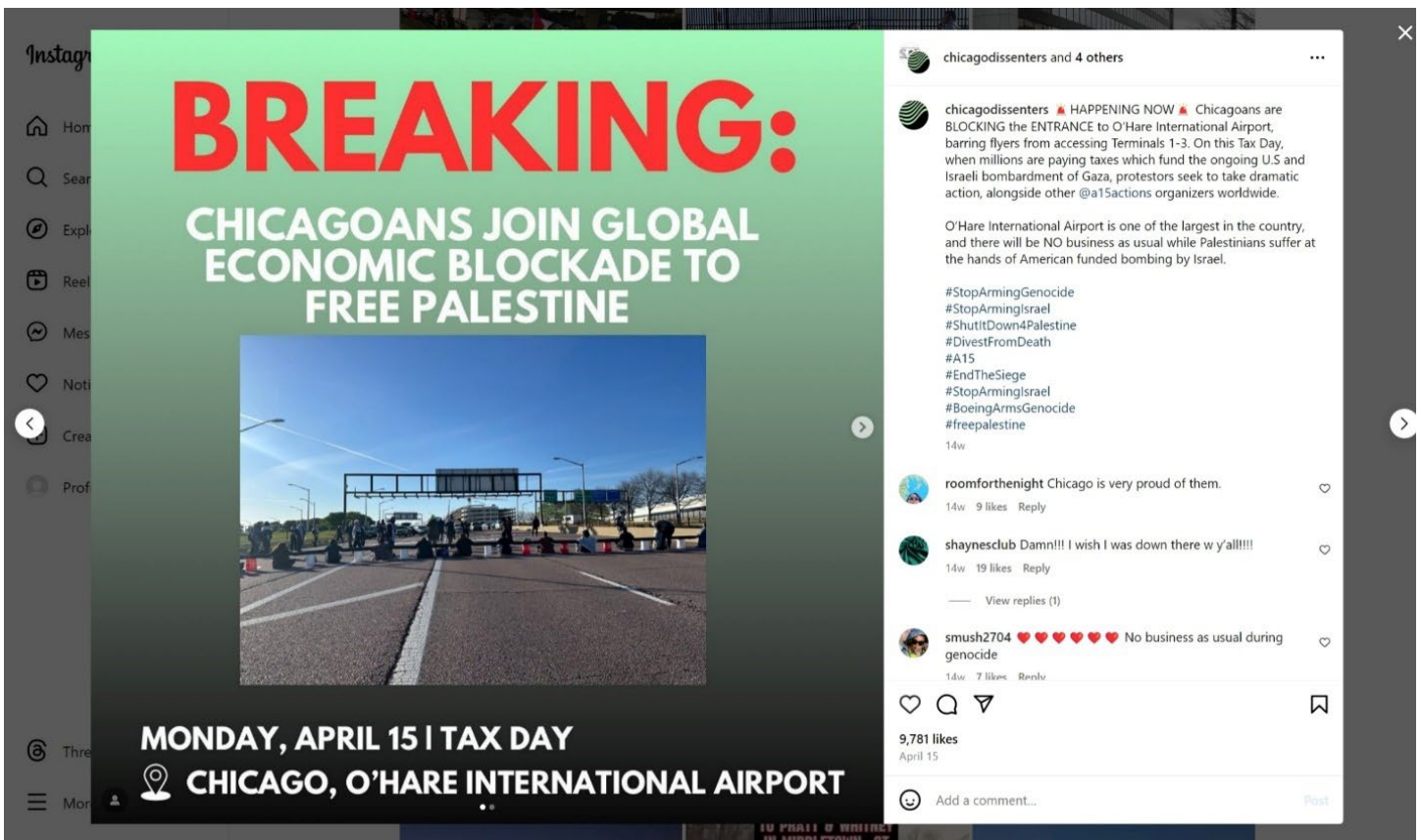
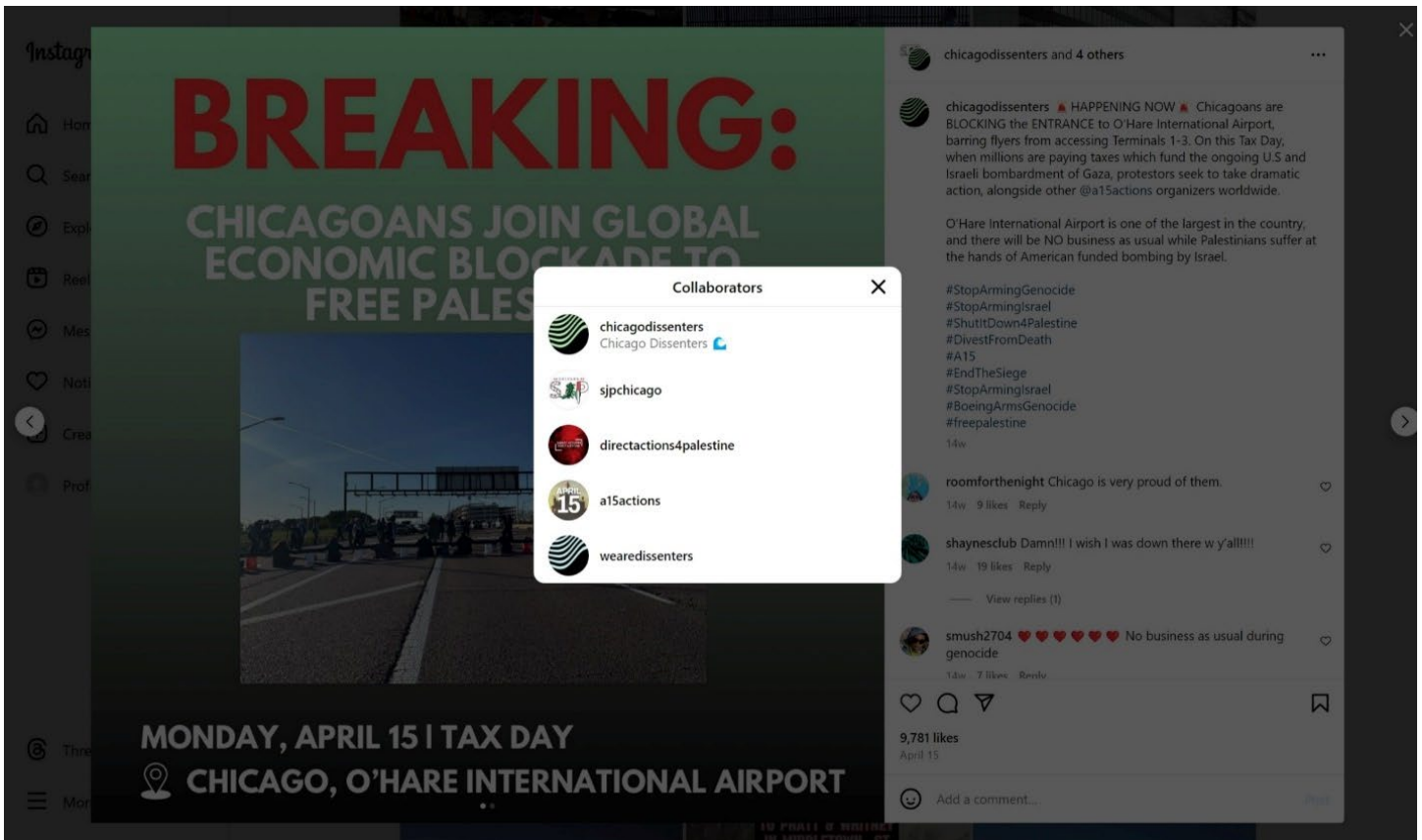
POSTS

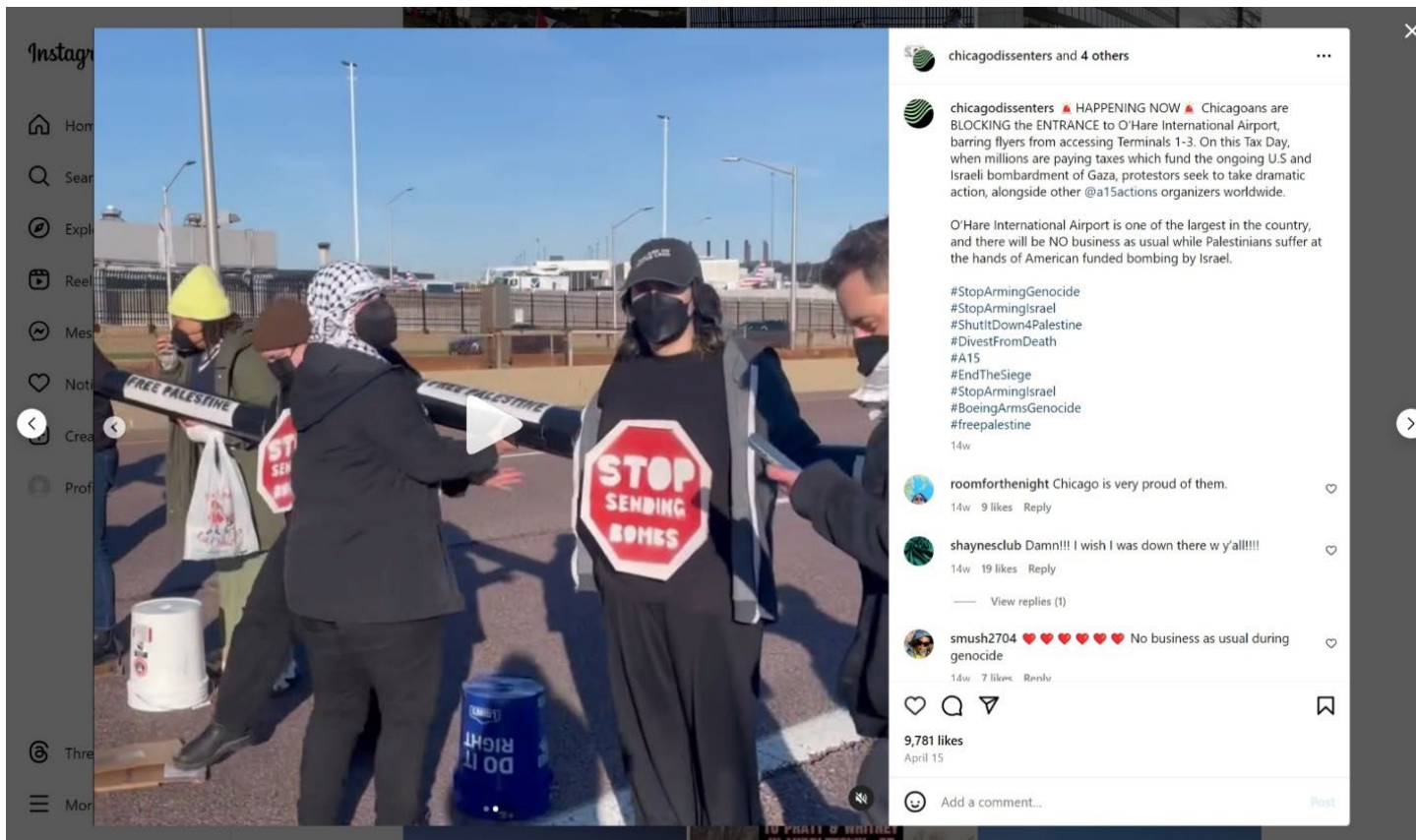
REELS

TAGGED

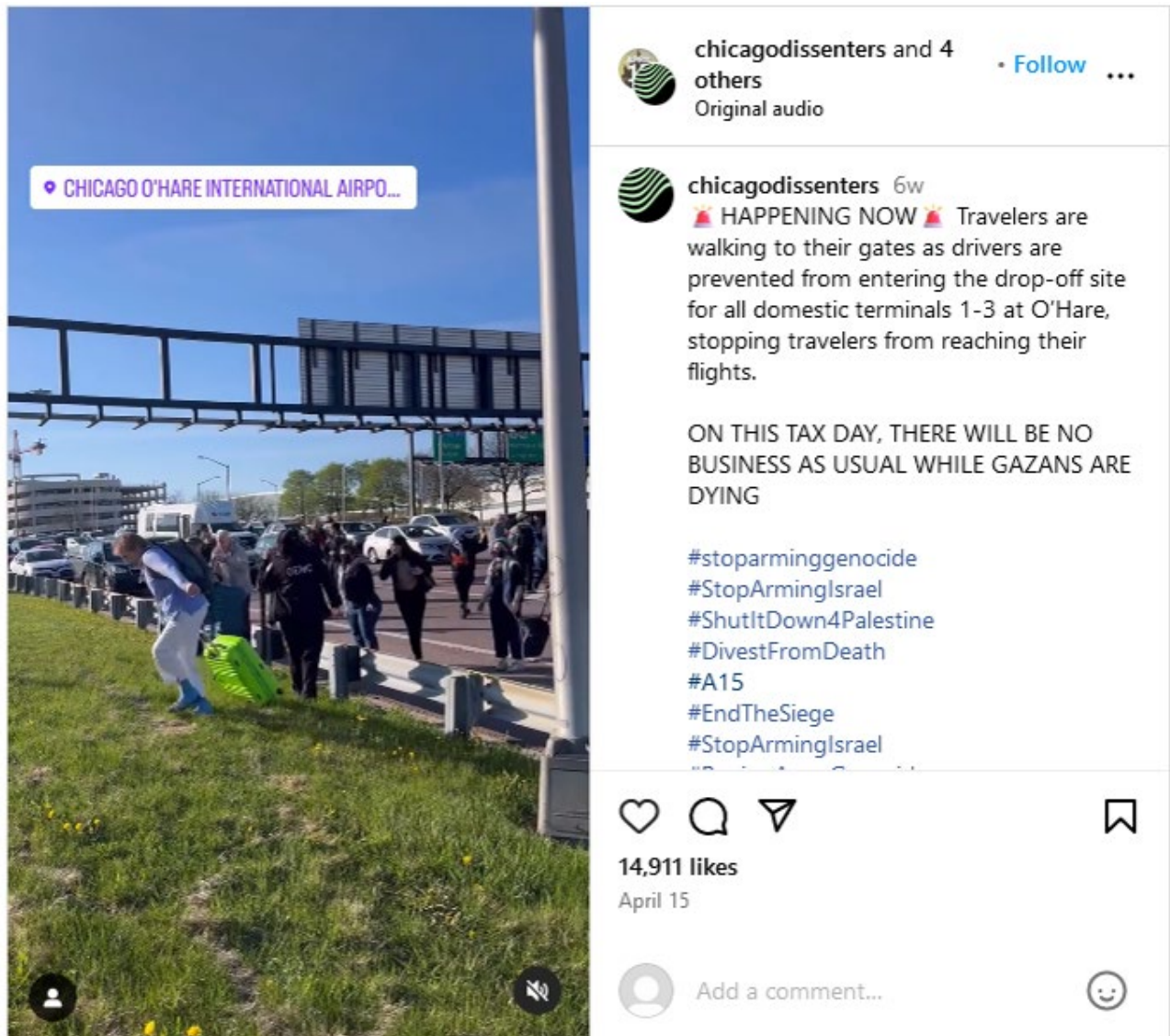
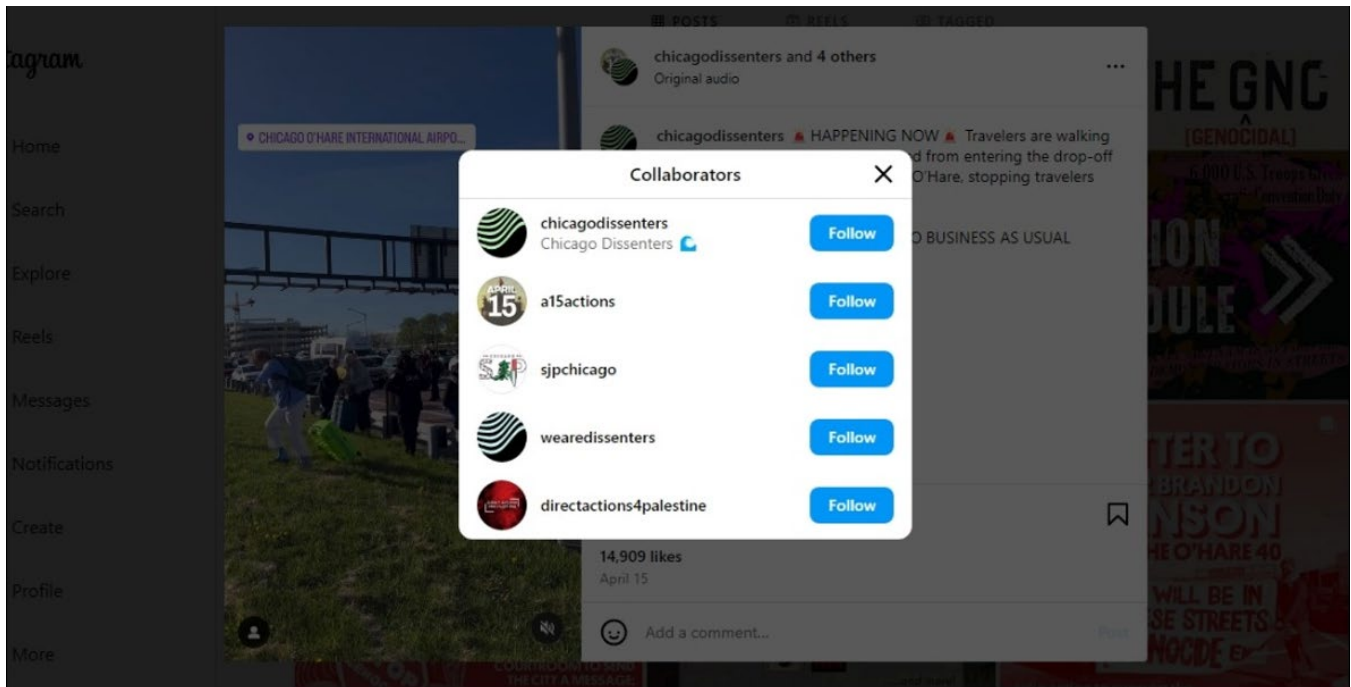


# **EXHIBIT 32**

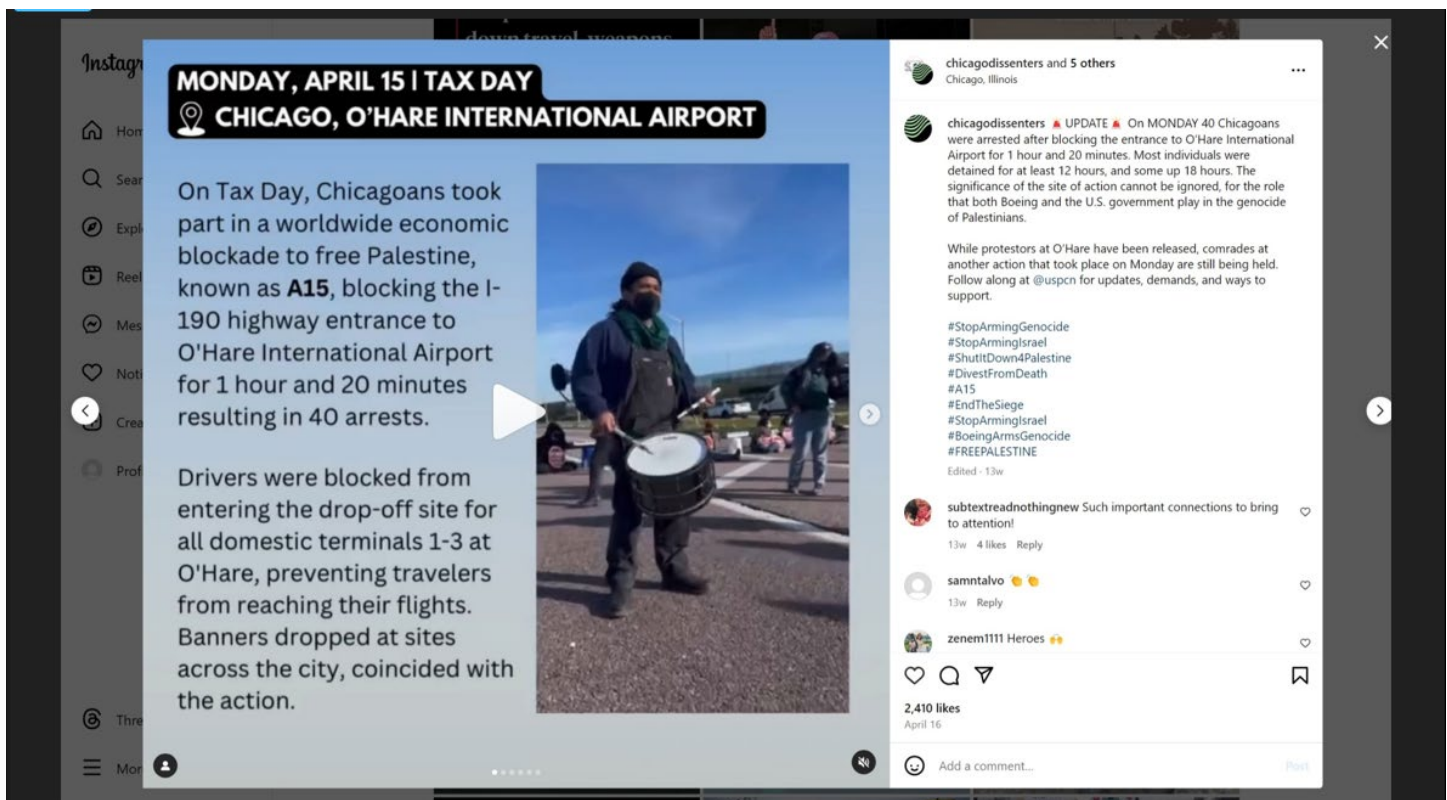
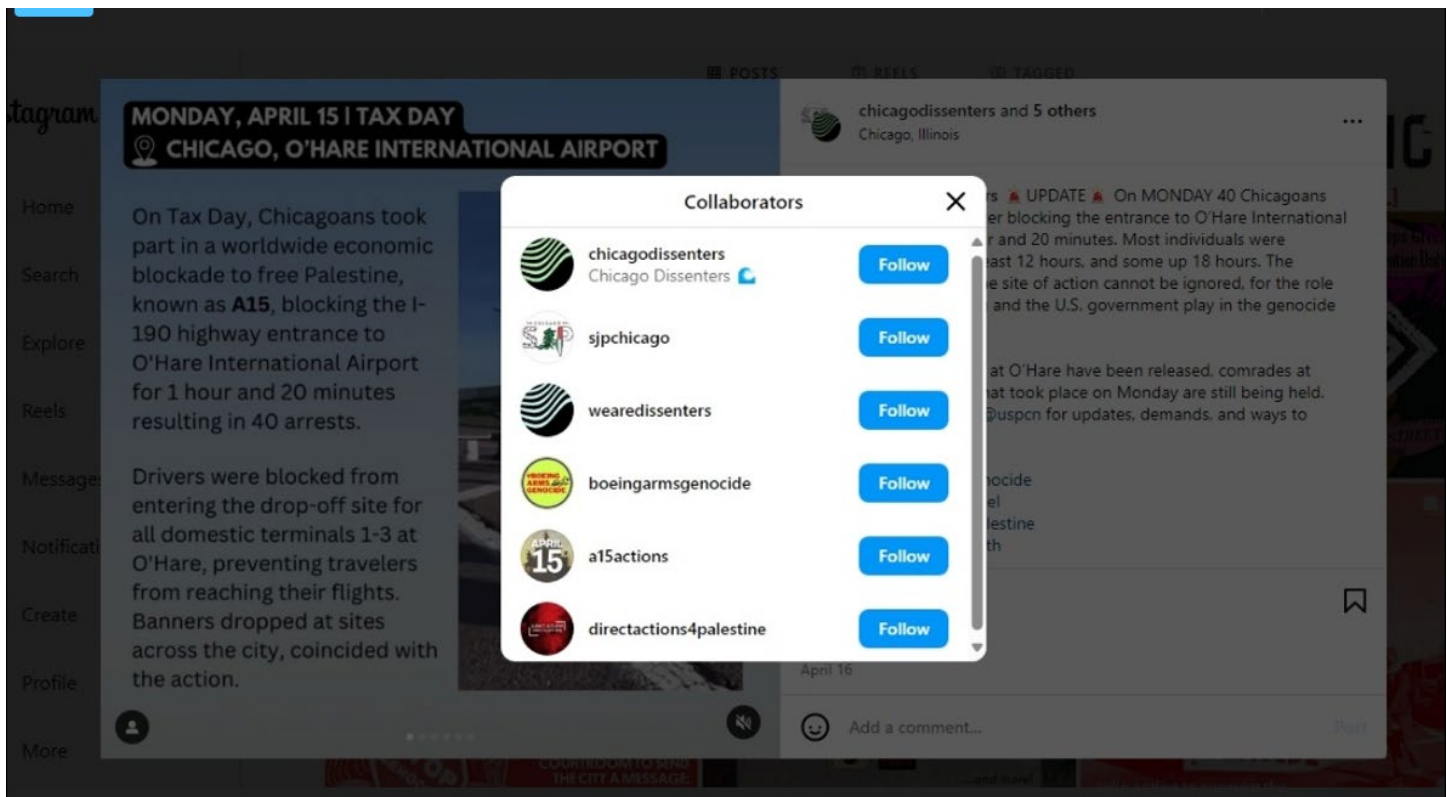


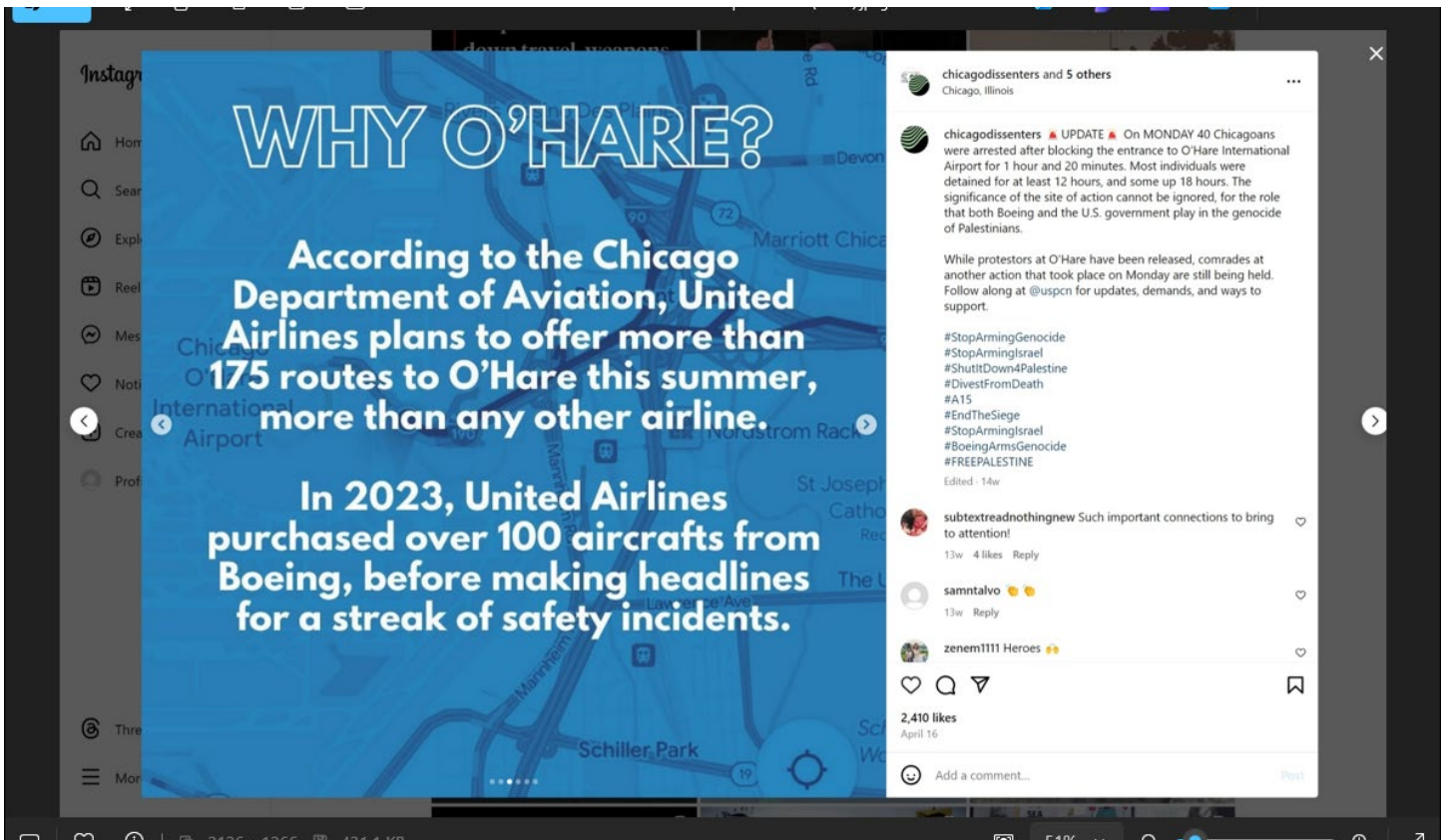
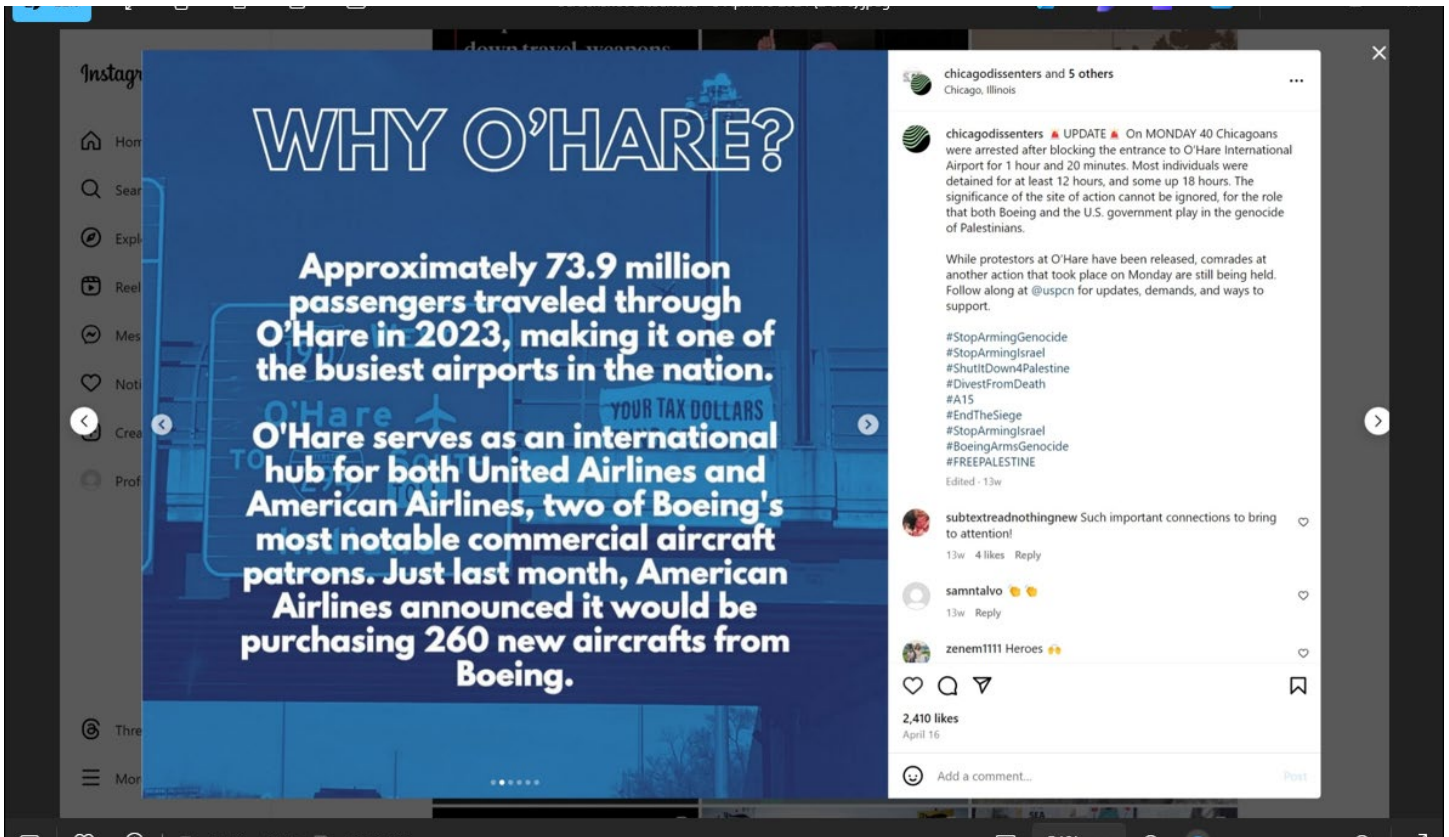


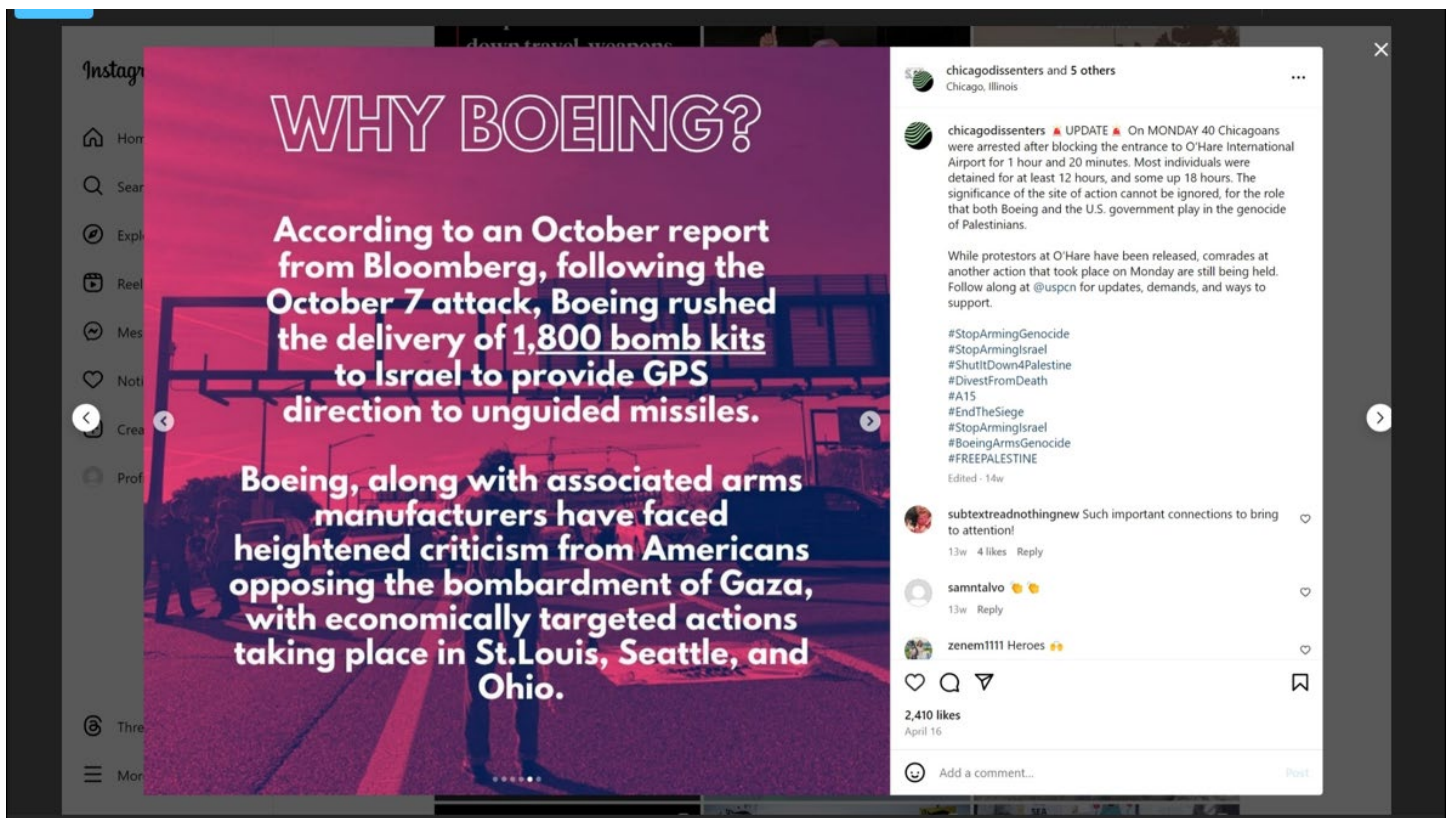
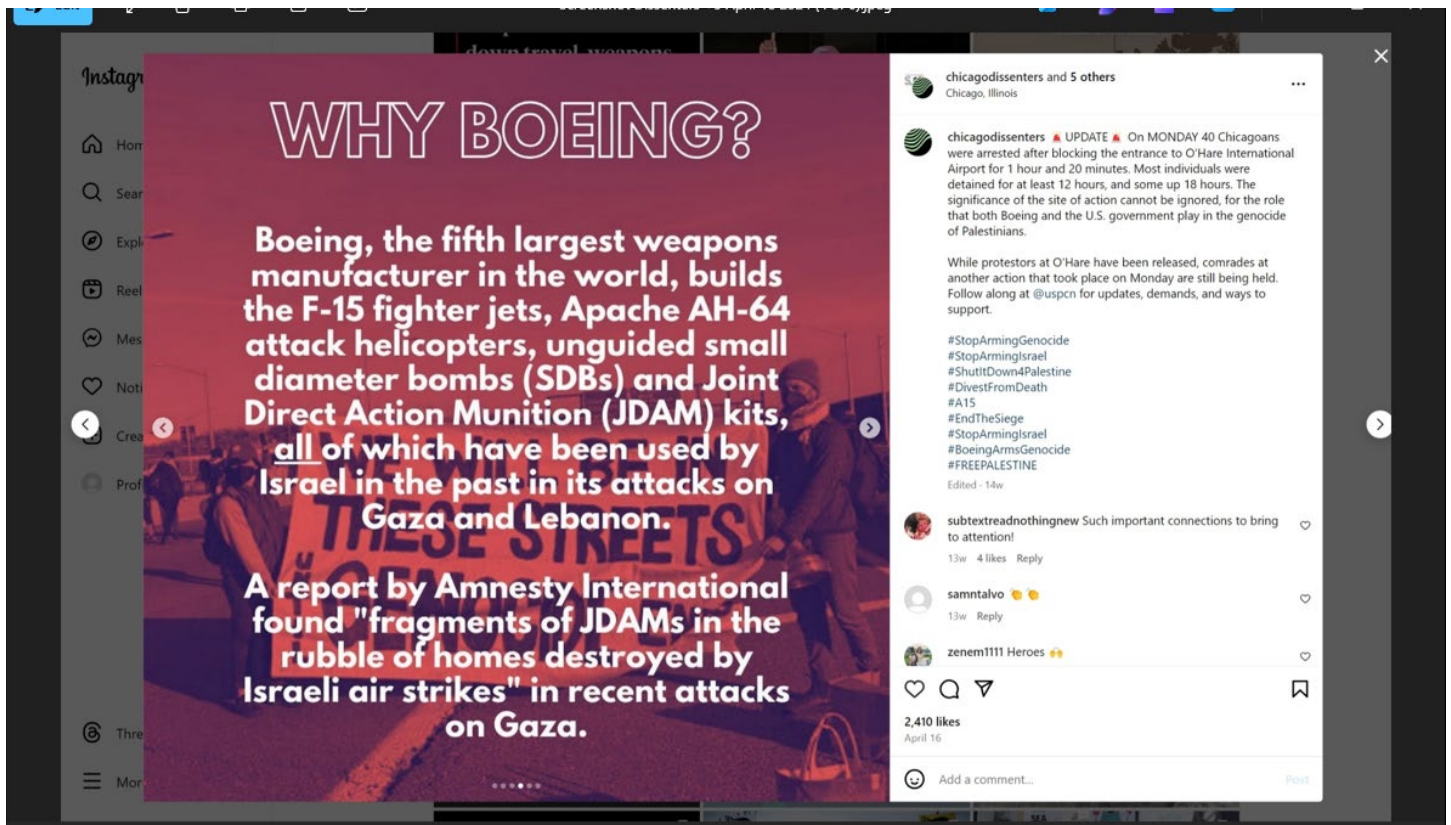
# **EXHIBIT 33**

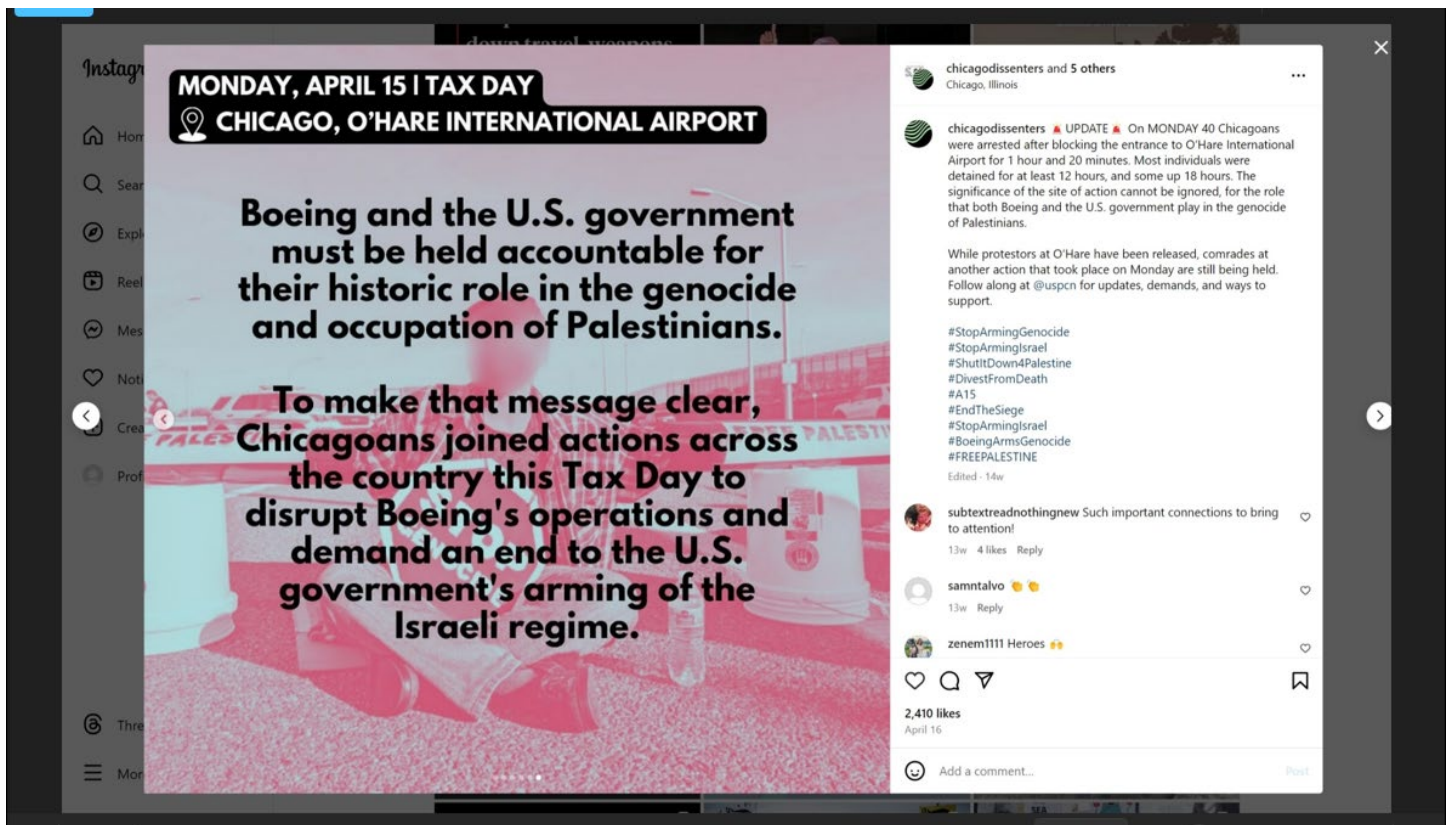


# **EXHIBIT 34**









# **EXHIBIT 35**

Pro-Palestinian Demonstrators Shut Down Airport Highways and Key Bridges in Major US Cities    about:reader?url=https%3A%2F%2Fwww.usnews.com%2Fnews%2Fbest-states%2Fillinois%...

[usnews.com](https://www.usnews.com)

## Pro-Palestinian Demonstrators Shut Down Airport Highways and Key Bridges in Major US Cities

*Elliott Davis Jr.* May 7, 2024

5–6 minutes

---



Nam Y. Huh

A passenger walks on the highway as he carries his luggage to at O'Hare International Airport in Chicago, Monday, April 15, 2024. Pro-Palestinian demonstrators blocked a freeway leading to three Chicago O'Hare International Airport terminals Monday morning, temporarily stopping vehicle traffic into one of the nation's busiest airports and causing headaches for travelers. (AP Photo/Nam Y. Huh)

CHICAGO (AP) — Pro-Palestinian demonstrators blocked

roadways in Illinois, California, [New York](#) and the Pacific Northwest on Monday, temporarily shutting down travel into some of the nation's most heavily used airports, onto the Golden Gate and Brooklyn bridges and on a busy West Coast highway.

In Chicago, protesters linked arms and blocked lanes of Interstate 190 leading into O'Hare International Airport around 7 a.m. in a demonstration they said was part of a global "economic blockade to free Palestine," according to Rifqa Falaneh, one of the organizers.

Traffic in the San Francisco Bay Area was snarled for hours as demonstrators shut down all vehicle, pedestrian and bike traffic on the Golden Gate Bridge and chained themselves to 55-gallon drums filled with cement across Interstate 880 in Oakland. Protesters marching into Brooklyn blocked Manhattan-bound traffic on the Brooklyn Bridge. In Eugene, [Oregon](#), protesters blocked Interstate 5, shutting down traffic on the major highway for about 45 minutes.

Protesters say they chose O'Hare in part because it is one of the largest airports. Among other things, they've called for an immediate [cease-fire](#) in the war between Israel and Hamas.

Anti- [war](#) protesters have demonstrated in Chicago near daily since [Hamas' Oct. 7](#) attack on southern Israel that killed around 1,200

people. Israeli warplanes and ground troops have since conducted a scorched-earth campaign on the Gaza Strip.

The Israeli offensive has killed more than 33,700 Palestinians, according to the Gaza health ministry. The ministry [does not differentiate](#) between civilians and combatants in its count but says [women and children](#) make up two-thirds of the dead.

O'Hare warned travelers on the social platform X to take alternative forms of transportation with car travel "substantially delayed this morning due to protest activity."

Some travelers stuck in standstill traffic left their cars and walked the final leg to the airport along the freeway, trailing their luggage behind them.

Among them was Madeline Hannan from suburban Chicago. She was headed to O'Hare for a work trip to [Florida](#) when her and her husband's car ended up stalled for 20 minutes. She got out and "both ran and speed walked" more than a mile (1.6 kilometers). She said she made it to the gate on time, but barely.

"This was an inconvenience," she said in a telephone interview from Florida. "But in the grand scheme of things going on overseas, it's a minor inconvenience."

While individual travelers may have been affected, operations at the airport appeared near normal with delays of under 15 minutes, according to the Chicago Department of Aviation.

Inbound traffic toward O'Hare resumed around 9 a.m.

Near Seattle, the Washington State Department of Transportation said a demonstration closed the main road to Seattle-Tacoma International Airport. Social media posts showed people holding a banner and waving Palestinian flags while standing on the highway, which reopened about three hours later.

About 20 protesters were arrested at the Golden Gate Bridge demonstration and traffic resumed shortly after noon, according to the California Highway Patrol. The agency said officers were making arrests at two points on the interstate, including one spot where roughly 300 protesters refused orders to disperse,

"Attempting to block or shut down a freeway or state highway to protest is unlawful, dangerous, and prevents motorists from safely reaching their destinations," the agency said in a statement.

Oregon State Police said 52 protestors were were arrested for disorderly conduct following the Interstate 5 protest in Eugene, Oregon, about 110 miles (177 kilometers) south of Portland. Six

vehicles were towed from the scene.

New York Police made numerous arrests, saying 150 protesters were initially involved in the march around 3:15 p.m., but that number quickly grew. The bridge was fully reopened by 5 p.m.

In Chicago, dozens of protesters were arrested, according to Falaneh. Chicago police said Monday that “multiple people” were taken into custody after a protest where people obstructed traffic, but they did not have a detailed count.

---

Associated Press writers Janie Har in San Francisco, Claire Rush in Portland, Oregon; Pat Eaton-Robb in Hartford, [Connecticut](#) and Audrey McAvoy in Honolulu contributed to this report.

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**Photos You Should See - May 2024**

# EXHIBIT 36



## Rifqa Falaneh, Michael Ratner Justice Fellow

**Rifqa Falaneh** is the Michael Ratner Justice Fellow at Palestine Legal where she challenges the censorship, surveillance, and suppression of advocates for Palestinian liberation.

Rifqa graduated from the University of Illinois (UIUC) College of Law in 2023. She is the founder of Bar None at UIUC Law, a civil rights organization dedicated to uplifting the legal struggles of marginalized communities. She also served as the Diversity, Equity, and Inclusion officer for the Student Bar Association where she surveyed and published a report on the experiences of diverse students at UIUC Law.

In the summer of 2022, Rifqa was an Ella Baker intern at the Center for Constitutional Rights where she worked on Palestine solidarity cases, Freedom of Information Act (FOIA) requests, and research on aiding and abetting a tort in New York for international crimes. She previously worked in the Emergency Services Division at Ascend Justice, where she assisted domestic violence survivors in obtaining emergency orders of protection. Rifqa has also represented parents and children in juvenile abuse and neglect cases as an Advanced Clinic Student at the UIUC Family Advocacy Clinic.

Most recently, Rifqa interned in Technology and Policy Accountability at Just Futures Law where she did litigation work on police involvement in federal immigration enforcement and the fast-developing field of technology-driven immigration enforcement.

Born and raised in Chicago, IL and originally from the Palestinian villages of Saffa and Lifta, Rifqa has been organizing for Palestine on university campuses for 7 years. She previously served as President of SJP DePaul and helped re-establish SJP Chicago in 2019.

# **EXHIBIT 37**

Instagram

- Home
- Search
- Explore
- Reels
- Messages
- Notifications
- Create
- Profile
- More



jinancheade • Follow

jinancheade 15w

Yesterday, on tax day, 40 protestors including myself were arrested while shutting down O'Hare International airport as part of the world-wide call to disrupt Boeing operations and demand an end to U.S. government's arming of the Israeli regime.

CPD's abuse and violations throughout over 15 hours of detention is a reflection that the police do not serve the people, but function to maintain U.S. empire and its agenda. Their violent crackdown on actions and protests yesterday is because these protest are working - we are winning.

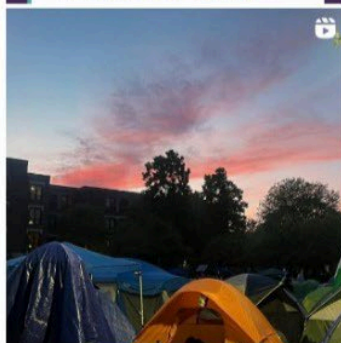
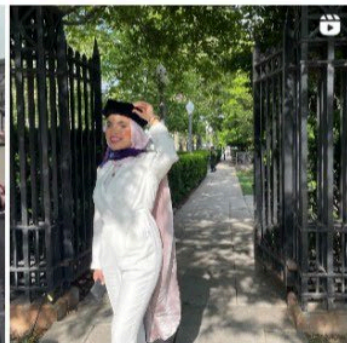
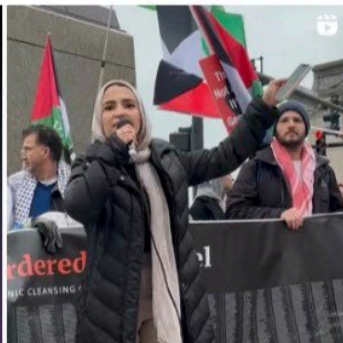
As a lawyer people always ask me how much I am willing to risk for Gaza - the

4,077 likes

April 16

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English © 2024 Instagram from Meta

# EXHIBIT 38



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# JINAN CHEHADE

Civil Litigation Junior Staff Attorney

[in](#) /Jinan Chehade

Jinan Chehade graduated from Georgetown University Law Center in 2023, building her experience in civil litigation and advocacy along the way. Jinan worked at the Department of Justice Civil Rights Special Litigation Division while attending Georgetown Law, and strategically analyzed cases on the intersection of policy and litigation. Jinan also represented refugees seeking asylum through the Center for Applied Legal Studies, where she successfully litigated and achieved asylum for her client. And as a legal intern at the Council on American Islamic Relations (CAIR), Jinan honed her litigatory skills on issues of religious freedom in the workplace and in schools. Jinan also worked as an intern at the American Civil Liberties Union (ACLU) on landmark cases of government accountability, free speech, and criminal justice reform.



Jinan also developed her leadership skills while doing all the above. At Georgetown Law, Jinan co-founded Law Students for Justice in Palestine. She also served as president of the Muslim Law Students Association (MLSA) and Program Chair of the National Muslims Law Students Association (NMLSA).

Prior to law school, Jinan studied Public Policy, Arabic, and Islamic World Studies at DePaul University. Born and raised in the Bridgeview (Little Palestine) area of Chicagoland, Jinan credits much of her drive for civil rights to the sense of purpose her community instilled in her at a young age. Jinan now has over eight years of experience organizing and working for civil rights in the community and on campuses. Jinan founded a national non-profit campaign that raised over \$1,000,000 for humanitarian causes around the world, including Yemen, Rohingya, and also for asylum seekers.



MLFA is a 501(c)(3) nonprofit organization (EIN: 01-0548371) with top rated standards of transparency and certified zakat eligible.



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TX 75080
- Email  
info@mlfa.org
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(972) 331-9021

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# EXHIBIT 39



**TAKE ACTION**

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## NEWS FEED



**Every life is precious.**

September 3, 2024



**Media Roundup: To be silent is to be complicit.**

August 28, 2024



**A brief guide to Israel's cultural genocide.**

August 28, 2024



**Thousands march on the DNC.**

August 20, 2024



**READ MORE**

# WE HAVE A PLAN TO END U.S. SUPPORT FOR ISRAEL'S OPPRESSION OF PALESTINIANS

Jewish Voice for Peace is the largest progressive Jewish anti-Zionist organization in the world.

We're organizing a grassroots, multiracial, cross-class, intergenerational movement of U.S. Jews into solidarity with Palestinian freedom struggle.

If you've been looking for a political home for Jews on the left in this perilous moment; if you've been wanting a Jewish community with justice at the center; if you've been looking to turn your rage and grief into meaningful, strategic action:

Join us. You belong here.

**TAKE ACTION**

**NEWS FEED**

**THE WIRE**

## CAMPAIGNS

**Fight antisemitism, reject  
the ADL.**




**Not On Our Dime**



**No Tech for Apartheid**


• • • • •

**ALL CAMPAIGNS**




**747,803**

Members & Supporters




**83**

Local Organizing Groups




**2.64m**

Digital Actions Taken



**2.13m**

Social Media Followers



**\$60**

Average Donation


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Stay up to date on the most important news from Palestine and the Palestine solidarity movement, and receive action alerts and invitations to online events.

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P.O. Box 589  
Berkeley, CA 94701  
(510) 465-1777

Media requests:  
media@jvp.org  
(929) 290-0317

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**WAYS TO GET INVOLVED**

Organize Locally

Student Network

Havurah Network




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BIJOCISM Network

Health Advisory Council

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**BECOME A MEMBER**

# **EXHIBIT 40**

← → ↻ <https://www.jewishvoiceforpeace.org/join-us/> ☆

**WHO WE ARE FIND LOCAL ORGANIZING WAYS TO GET INVOLVED FAQ**

# FIND LOCAL ORGANIZING

We will build rooted bases of power in cities, towns, and campuses all across the U.S. Click your area on the map to see if we're there yet.

From city councils to state pension funds to student governments, we're fighting off right-wing legislation, demanding an end to government funding and support for Israeli apartheid, and growing the ranks in our communities who support Palestinian freedom as part of an intersectional, progressive agenda.

**LEARN MORE**




---

# FIND LOCAL ORGANIZING

We will build rooted bases of power in cities, towns, and campuses all across the U.S. Click your area on the map to see if we're there yet.

From city councils to state pension funds to student governments, we're fighting off right-wing legislation, demanding an end to government funding and support for Israeli apartheid, and growing the ranks in our communities who support Palestinian freedom as part of an intersectional, progressive agenda.

**LEARN MORE**



**Illinois**

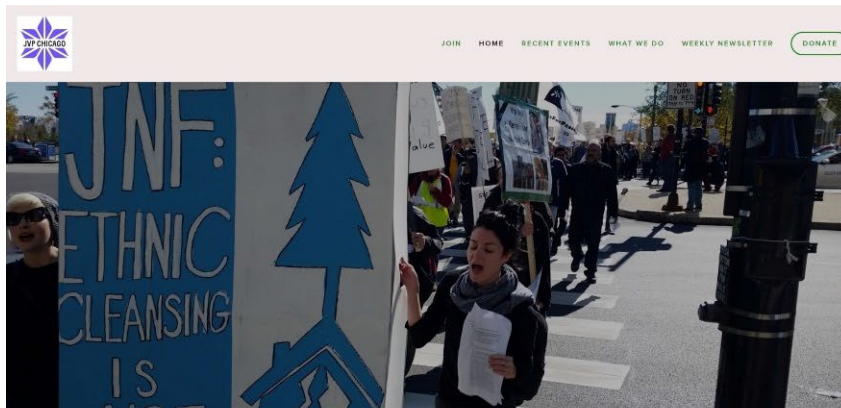
**Chicago**

- Email
- Website
- Facebook
- Instagram
- Interest Form

**Northwestern**

- Instagram

# EXHIBIT 41



### Jewish Voice for Peace-Chicago organizes for Human Rights and Equality for Palestinians and All People

Jewish Voice for Peace-Chicago is a branch of the national organization Jewish Voice for Peace. We are part of a global movement demanding an end to Israel's occupation of the West Bank and blockade on Gaza; equality for Palestinian citizens of Israel; and the implementation of the rights of Palestinian refugees to return to the homes and properties from which they have been displaced since 1948.

Jewish Voice for Peace opposes anti-Muslim, anti-Arab, anti-Black, anti-immigrant, anti-LGBTQIA, anti-woman and anti-Person of Color bigotry and state violence.

Also read JVP's Approach to Zionism to clarify where we stand. This will be the subject of much thought provoking discussion.

Help Support Our Chapter through your  
Donations

**GET INVOLVED!**

TO SIGN UP FOR MAILINGS FROM THE CHAPTER AND NATIONAL, GO TO THE NATIONAL PAGE



HOW DO I PLUG IN? CONTACT US: [info@jvpchicago.org](mailto:info@jvpchicago.org).  
ALSO, FILL OUT THE LINKED FORM FOR A PRE-SCREENING INTO THE CHAPTER.  
NEED A SPEAKER. FILL OUT THIS FORM AND LET US KNOW WHAT YOU EXPECT

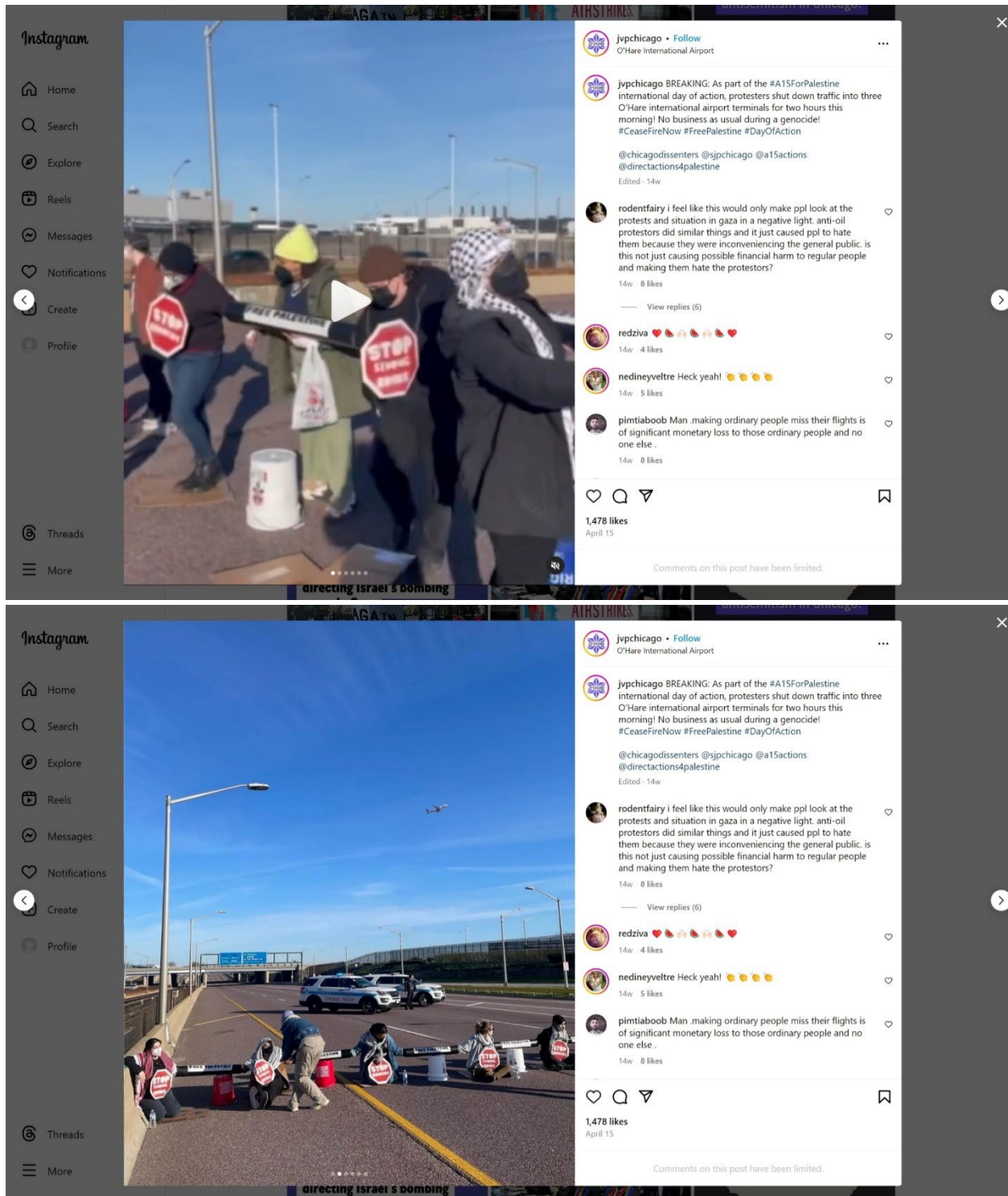


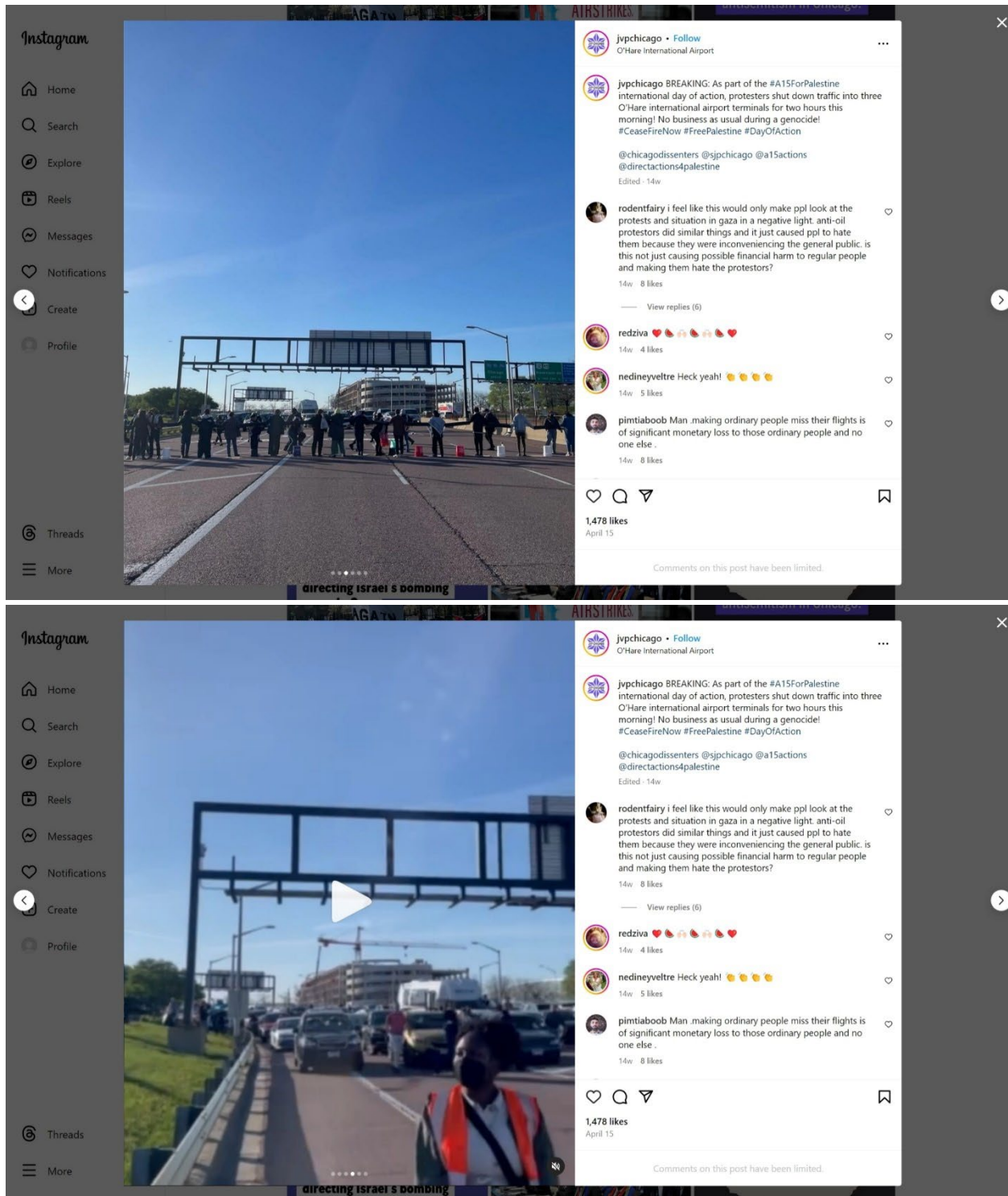
[info@jvpchicago.org](mailto:info@jvpchicago.org)

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# EXHIBIT 42





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Chicago Tribune
Protesters blocked highway entering O'Hare airport

jvpchicago • Follow
O'Hare International Airport

jvpchicago BREAKING: As part of the #A15ForPalestine international day of action, protesters shut down traffic into three O'Hare international airport terminals for two hours this morning! No business as usual during a genocide! #CeaseFireNow #FreePalestine #DayOfAction

@chicagodissenters @sjpchicago @a15actions @directactions4palestine

Edited · 14w

rodentfairly i feel like this would only make ppl look at the protests and situation in gaza in a negative light. anti-oil protestors did similar things and it just caused ppl to hate them because they were inconveniencing the general public. is this not just causing possible financial harm to regular people and making them hate the protestors?

14w · 8 likes

View replies (6)

redziva

14w · 4 likes

nedineyveltre Heck yeah!

14w · 5 likes

pimtiaboob Man .making ordinary people miss their flights is of significant monetary loss to those ordinary people and no one else .

14w · 8 likes

1,478 likes
April 15

Comments on this post have been limited.

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Pro-Palestinian demonstrators block traffic into Chicago airport, causing headaches for travelers

SOPHIA TAREEN
39 mins ago

CHICAGO (AP) — Pro-Palestinian demonstrators blocked a freeway leading to three Chicago O'Hare International Airport terminals Monday morning, temporarily stopping vehicle traffic into one of the nation's busiest airports and causing headaches for travelers.

Protesters linked arms and blocked lanes of Interstate 190 around 7 a.m., a demonstration they said was part of a global "economic blockade to free Palestine," according to Rifqa Falaneh, one of the organizers. Similar demonstrations blocking a freeway in California's Bay Area also took place Monday.

jvpchicago • Follow
O'Hare International Airport

jvpchicago BREAKING: As part of the #A15ForPalestine international day of action, protesters shut down traffic into three O'Hare international airport terminals for two hours this morning! No business as usual during a genocide! #CeaseFireNow #FreePalestine #DayOfAction

@chicagodissenters @sjpchicago @a15actions @directactions4palestine

Edited · 14w

rodentfairly i feel like this would only make ppl look at the protests and situation in gaza in a negative light. anti-oil protestors did similar things and it just caused ppl to hate them because they were inconveniencing the general public. is this not just causing possible financial harm to regular people and making them hate the protestors?

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nedineyveltre Heck yeah!

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pimtiaboob Man .making ordinary people miss their flights is of significant monetary loss to those ordinary people and no one else .

14w · 8 likes

1,478 likes
April 15

Comments on this post have been limited.

# **EXHIBIT 43**

## 54 arrested after protest blocks I-190 near Chicago O'Hare Airport, Loop march stops traffic



Dozens were arrested after pro-Palestinian protesters blocked the roadway entering into Terminal 1 at O'Hare and later halted traffic downtown.

CHICAGO (WLS) -- Dozens were arrested Monday after pro-Palestinian protesters blocked the roadway entering into Terminal 1 at O'Hare Airport and later halted traffic downtown.

Friends and supporters waited outside Area Five police headquarters later Monday for the 40 people arrested to be released.

**[ABC7 Chicago is now streaming 24/7. Click here to watch](#)**

Those arrested included 31 women and nine men, ages 19-43, according to Chicago police.

At one point Monday morning, the pro-Palestinian protesters completely blocked access to Terminal 1 at the airport, and they blocked all lanes on westbound Interstate 190.

Traffic came to a complete standstill right in the middle of rush hour at one of the busiest airports in the country. Chopper 7 flew above a miles-long backup for people heading into O'Hare.

"Enough is enough. The U.S. government has given us no choice but to disrupt business as usual," Simone Tucker said.

The demonstrators chose April 15 because it's tax day in the U.S. Their objective is to bring attention to the war in Gaza and support Palestinians.

For hundreds of air travelers, however, the point of the protest was lost amid their frustration with trying to catch their flights.

**LIVE TRAFFIC: [Check out the latest conditions on our live traffic map](#)**

Several spoke as they got out and walked from the interstate to their terminals, luggage in hand.

"I understand people have the freedom to do what they want, but, when it starts impacting me personally, it's kind of an issue," frustrated traveler Mike said.

One woman walked, carrying her child.

"This is the last thing we wanna be doing," she said.

In Chicago, the protesters spent a few hours in a police vehicle, hands bound together with plastic ties, before being processed and released.

"We made our point. We stood in solidarity with our comrades in Palestine, and we disrupted business as usual," Tucker said.

Those arrested were expected to be released soon, and were charged with misdemeanors. They're due in court at a later date.

On Monday afternoon, another pro-Palestinian protest happened downtown.

"Injustice! Injustice all over the world. Everyone deserves to be free," said demonstrator Amna Hassan.

Dozens were near Clark and Adams streets about 4:30 p.m. in the Loop. They said they would not move from the roadway until all of those arrested earlier Monday were released.

As the large group carved a flag-led course through city streets, police cut them off at the pass, blocking protesters along Adams Street.

"It's terrible the way the cops are blocking us off from marching. We haven't had this issue before. We're out here every weekend. This is the first time they've reacted like this," said demonstrator Javiar Vinuela.

Passionate calls for freedom devolved into chaos as police clashed with protesters and punches were thrown as the crowd shoved and wrestled in streets.

Commuter traffic screeched to a halt along Wacker Drive, first for prayers and as demonstrators refused to cede the intersection at rush hour, officers seized their speakers and physical scuffles ensued.

There appeared to be some heated exchanges between protesters and police, and some people were seen being taken away in handcuffs.

By about 6 p.m., protesters had shut down Upper Wacker Drive in both directions at LaSalle Street.

Police said 14 people were arrested during the Loop protest.

Among other things, protesters have called for an immediate cease-fire in the war between Israel and Hamas.

"Our families are dying. Our people are dying. Our families have been displaced multiple times," said Deanna Othman with American Muslims for Palestine Chicago. "We will not stop until there is a permanent, unconditional cease-fire, until the United States halts military funding to Israel."

Anti-war protesters have demonstrated in Chicago near daily since Hamas' Oct. 7 attack on southern Israel that killed around 1,200 people. Israeli warplanes and ground troops have conducted a scorched-earth campaign on the Gaza Strip.

The Israeli offensive has killed more than 33,700 Palestinians, according to the Gaza health ministry. The ministry does not differentiate between civilians and combatants in its count but says women and children make up two-thirds of the dead.

Sarah van Loon, regional director of the American Jewish Committee (AJC) Chicago, said in a statement, *"Whatever point these protesters were trying to make was lost on the thousands of people massively inconvenienced by this woefully misguided demonstration. There is a time and place for*

*everything, including a ceasefire. That can happen in Gaza once Hamas releases all the hostages, lays down its arms, and is prevented from having a role determining the future of Gaza. Perhaps these protesters should direct their frustration at Hamas, for rejecting yet another proposal that could lead to a ceasefire. Performative charades like this do nothing to advance the cause of peace."*

While the Monday morning protest was going on, a United Airlines spokesperson said [a flight from Chicago to Washington](#), "returned safely to Chicago, after a non-credible threat was found written on a lavatory mirror."

The Chicago protests on Monday were some of dozens in several countries around the world.

Pro-Palestinian protesters also [shut down the Golden Gate Bridge](#) Monday morning.

There were similar protests in places like Philadelphia, San Antonio and Oregon.

*The Associated Press contributed to this report.*



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# **EXHIBIT 44**



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Me





For Business

[Get hired](#)  
[Premium](#)

**Simone Pass Tucker** (They/Them) · 3rd

Organizer versed in relational communications and political strategy

-  Jewish Voice for Peace
-  William & Mary

Chicago, Illinois, United States · [Contact info](#)

124 connections

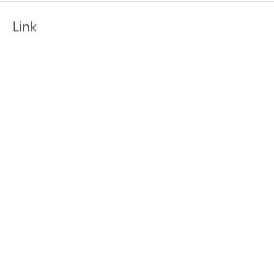
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**About**

I am passionate about equity, diversity, social justice, politics, international affairs, urban planning, and law. Experience with political strategy, cross-departmental collaboration, community and issue-based organizing, leadership development, volunteer management, recruitment, data management, relationship build ...see more


**Featured**

Link



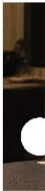
**In Falls Church, candidate wants to make hometown more livable**  
Washington Jewish Week

Link



**Letter Supporting F.C. Council Candidate Simone Pass Tucker**  
Falls Church News-Press Online

Link




**Non-Falls Washi Simo histo**

**Activity**


128 followers

[Posts](#)
[Comments](#)

Simone Pass Tucker posted this · 2mo



I'm so excited to announce that I have accepted a new position as Student Organizer at [Jewish Voice for Peace](#)!

 31

5 comments

Show all posts →

## Experience



### Student Organizer

Jewish Voice for Peace · Full-time

Apr 2024 - Present · 3 mos

💡 Leadership Development, Nonprofit Organizations and +2 skills

### Public Relations Manager

Metro Area Modern Reproductive Care · Part-time

Sep 2023 - Present · 10 mos

Washington, District of Columbia, United States · Remote

Social media content and brand identity creation and management, press relations, Spanish translation

💡 Public Affairs, Online PR and +4 skills

### Board Member

Charlene Eisenberg Reproductive Health Collaborative · Part-time

Feb 2023 - Present · 1 yr 5 mos

Washington, DC · Hybrid

Fundraising, planning and attending events, recruitment, advocacy for abortion and gender-affirming care, engagement of donors and public...

💡 Community Engagement, Policy Advocacy and +6 skills

### Field Director

Community for Kina Collins · Part-time

Nov 2023 - Mar 2024 · 5 mos

Chicago, Illinois, United States · Remote

Co-director of field strategy and operations for progressive candidate for Illinois' 7th Congressional district

💡 Field Coordination, Relational Organizing and +4 skills



### Steward

Nonprofit Professional Employees Union · Full-time

Mar 2023 - Dec 2023 · 10 mos

Elected to the Nonprofit Professional Employees Union, Local 70 of the International Federation of Professional and Technical Engineers, AFL-CIO....

💡 Negotiation, Teamwork and +2 skills

Show all 12 experiences →

## Education



### William & Mary

Sociology

2018 - 2020

Activities and societies: J Street U, Students for Justice in Palestine, Sunrise Movement

💡 Legal Research, Skilled Multi-tasker and +13 skills



### North Carolina State University

Political Science and Government

2016 - 2018

Activities and societies: Founding member and President of Arabic Club, AMTA Mock Trial, Senator for Student Government 97th session, ...see more

Transferred to The College of William and Mary in 2018

Legal Research, Skilled Multi-tasker and +12 skills

## Volunteering



### Member

IfNotNow

Jul 2022 - Present · 2 yrs

Human Rights

Participating member and volunteer with the Chicago chapter

### 'Let Our People Know' Trip Participant

J Street U

Jun 2019 · 1 mo

Politics

A 10-day, one-time political and human-rights centered trip to Israel-Palestine for college students. We met with Knesset members, P/ ...see more

Show all 10 volunteer experiences →

## Skills

### Training

Student Organizer at Jewish Voice for Peace

### Data Management

Show all 52 skills →

## Publications

### What I saw after Israel's highlight reel

Washington Jewish Week · Jul 31, 2019

Show publication ↗

### We Went To See The Occupation. We Came Back More Connected To Israel.

The Forward · Jul 24, 2019

Show publication ↗

Other authors

Show all 4 publications →

## Languages

### Arabic- Palestinian Dialect

Limited working proficiency

### Modern Standard Arabic

Limited working proficiency

Show all 3 languages →

## Interests

# **EXHIBIT 45**



Dissenters is leading a new generation of young people to reclaim our resources from the war industry, reinvest in life-giving services, and repair collaborative relationships with the earth and people around the world.

Our Vision



DISSENTERS

Instagram Twitter Facebook

# **EXHIBIT 46**



Home



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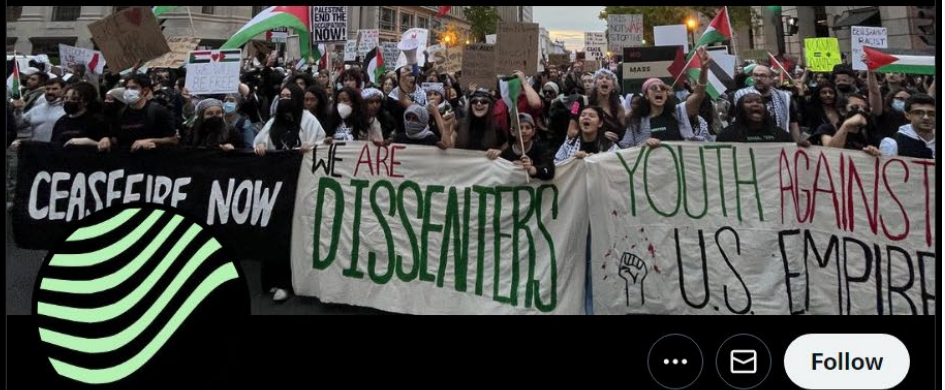
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**Dissenters**

@wearedissenters

An anti-militarism youth movement turning the tide against endless war in our communities here and abroad

Non-Governmental & Nonprofit Organization

Turtle Island, Occupied U.S. [wearedissenters.org](https://wearedissenters.org)

Joined December 2019

476 Following 12.5K Followers



Followed by Jewish Voice for Peace

Posts

Replies

Media

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**Dissenters** @wearedissenters · Apr 15

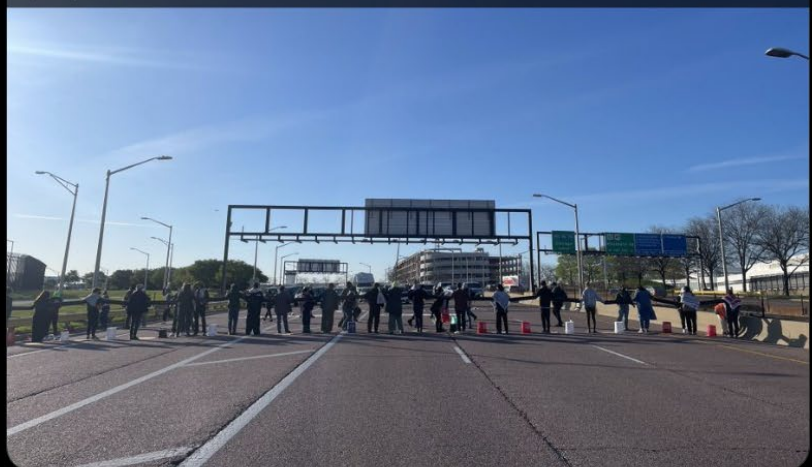
BREAKING: Organizers are blockading the road entering O'Hare Airport in Chicago !!!

NO business as usual while the US green lights the genocide of Palestinians

**Dissenters**

3,130 posts

Follow



A15EconomicBlockade

249

937

2.2K

435K




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- Bookmarks
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- Premium
- Verified Orgs
- Profile
- More

Post

5 39 71 3.3K

**Dissenters** @wearedissenters · Apr 15

UPDATE: Passengers are now walking to their gates as protesters continue to hold it down and refuse to move 🇵🇸 🇮🇱



0:07 / 0:19

**Dissenters** @wearedissenters · Apr 15

**BREAKING: Organizers are blockading the road entering O'Hare Airport in Chicago !!!**

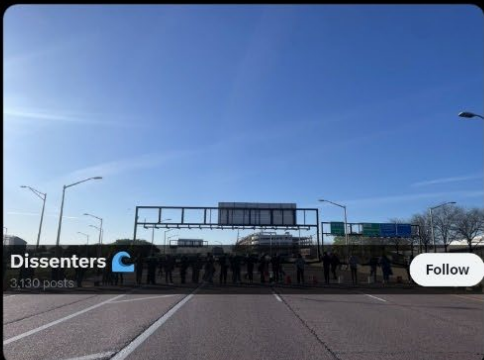
NO business as usual while the US green lights the genocide of Palestinians ✖

318 713 1.8K 344K

**Dissenters** @wearedissenters · Apr 15

**BREAKING: Organizers are blockading the road entering O'Hare Airport in Chicago !!!**

NO business as usual while the US green lights the genocide of Palestinians ✖



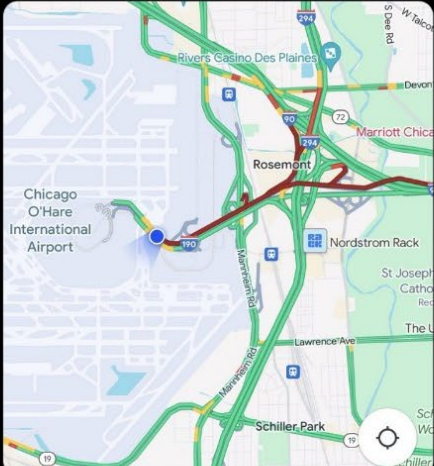
**Dissenters** 3,130 posts Follow

A15EconomicBlockade

249 937 2.2K 435K

**Dissenters** @wearedissenters · Apr 15

**DIRECT ACTION WORKS !!!**



72 41 180 27K

# **EXHIBIT 47**



UPDATE: All 40 protesters arrested have been released 🎉

This was possible because of our community who consistently called and advocated for their release. [#WeKeepUsSafe](#)

**Dissenters** @wearedissenters · Apr 15

BREAKING: Organizers are blockading the road entering O'Hare Airport in Chicago !!!

NO business as usual while the US green lights the genocide of Palestinians ✖

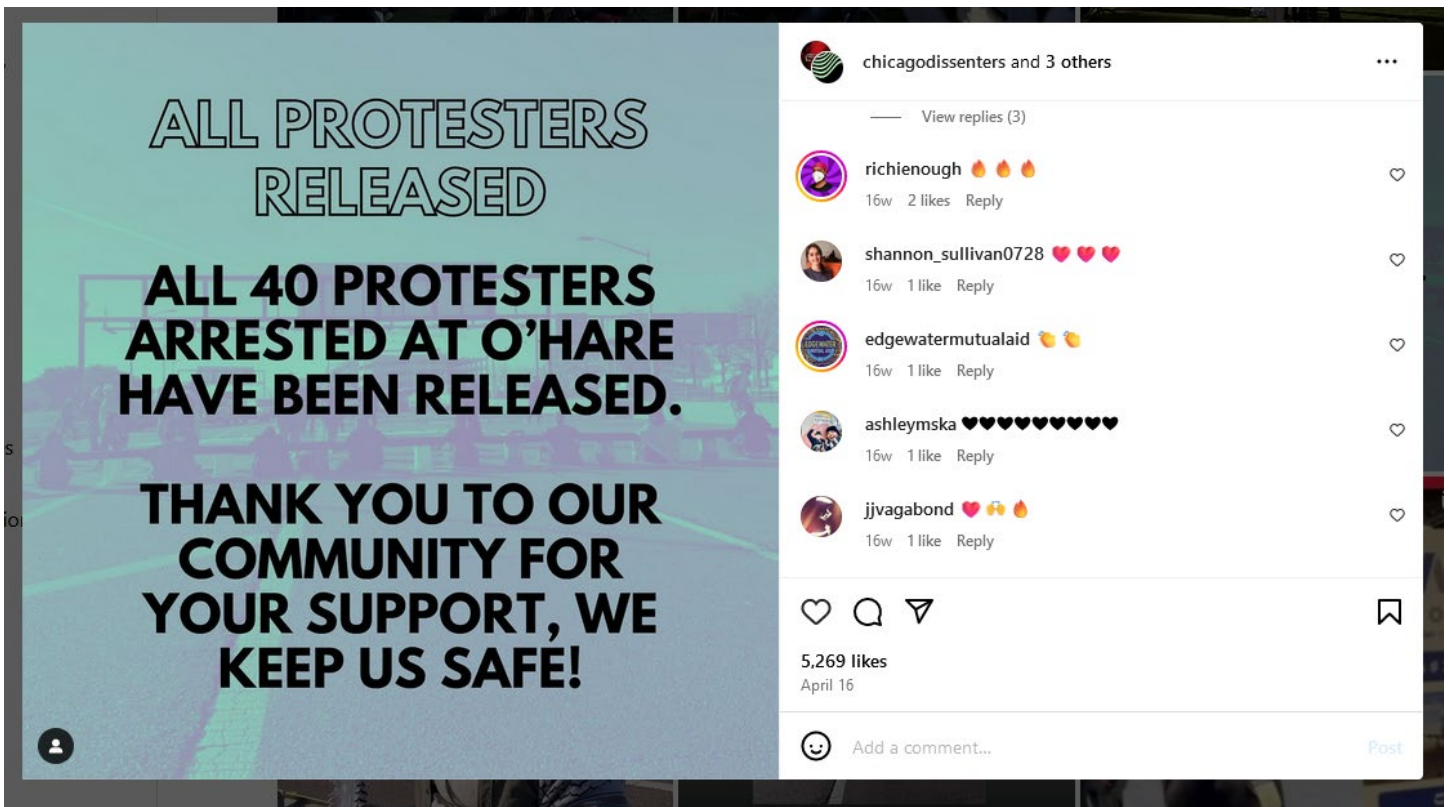
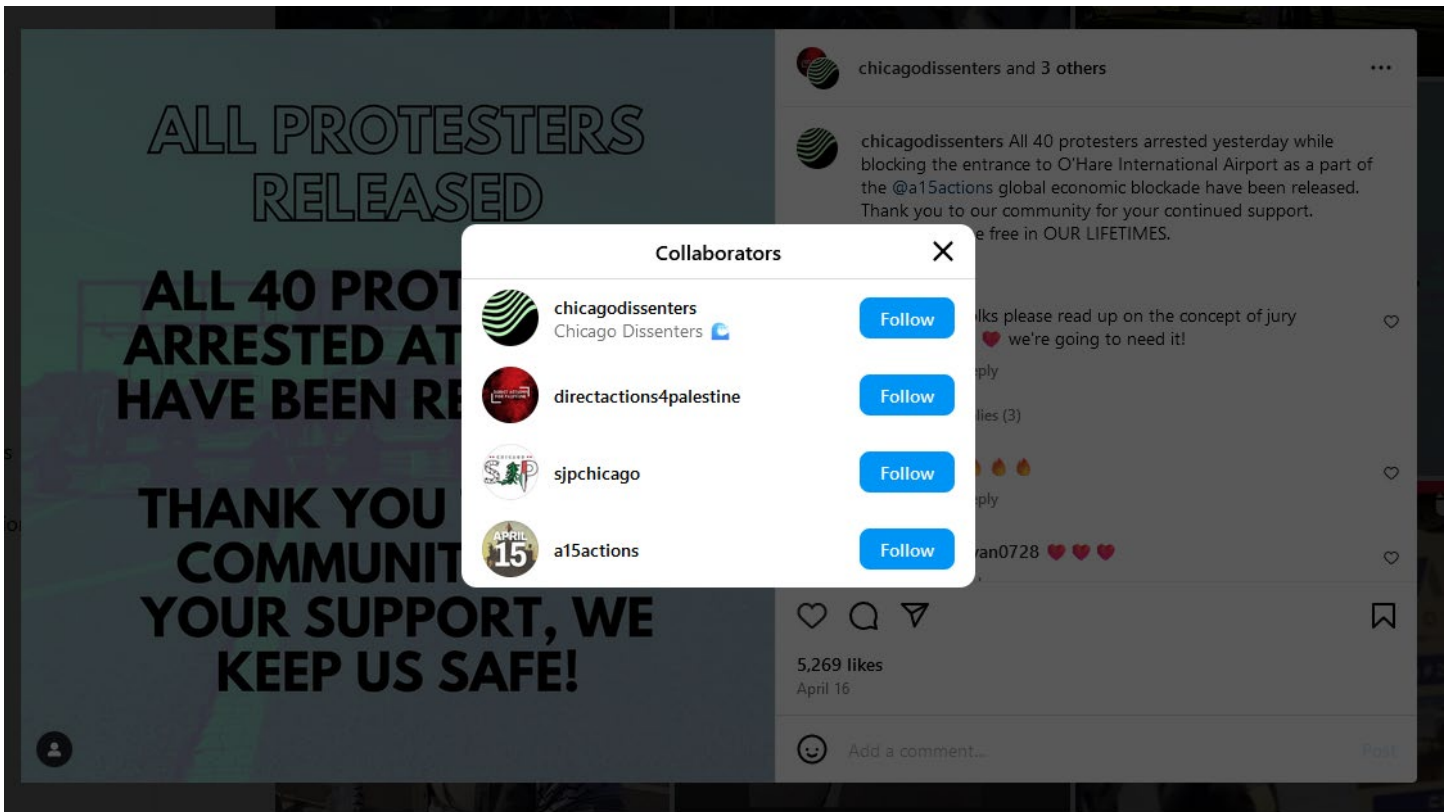


1:33 PM · Apr 16, 2024 · **45.8K** Views

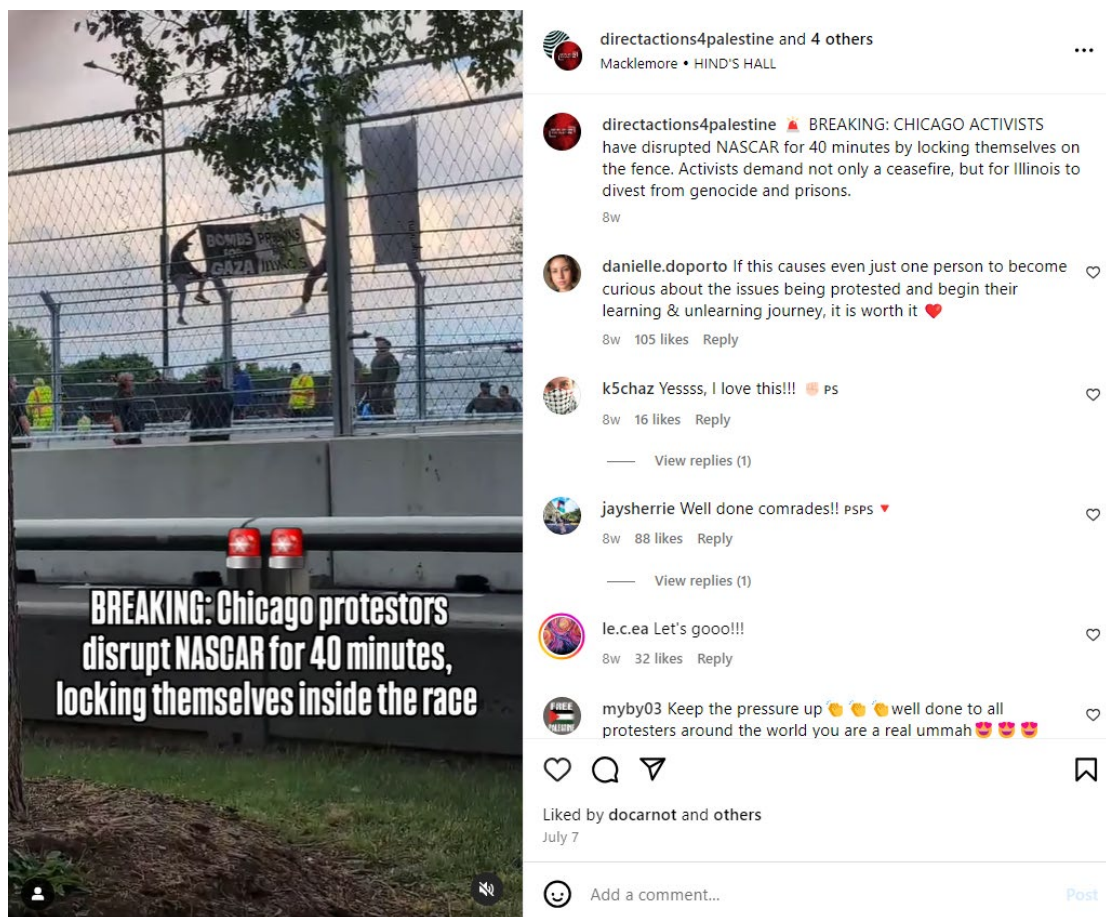
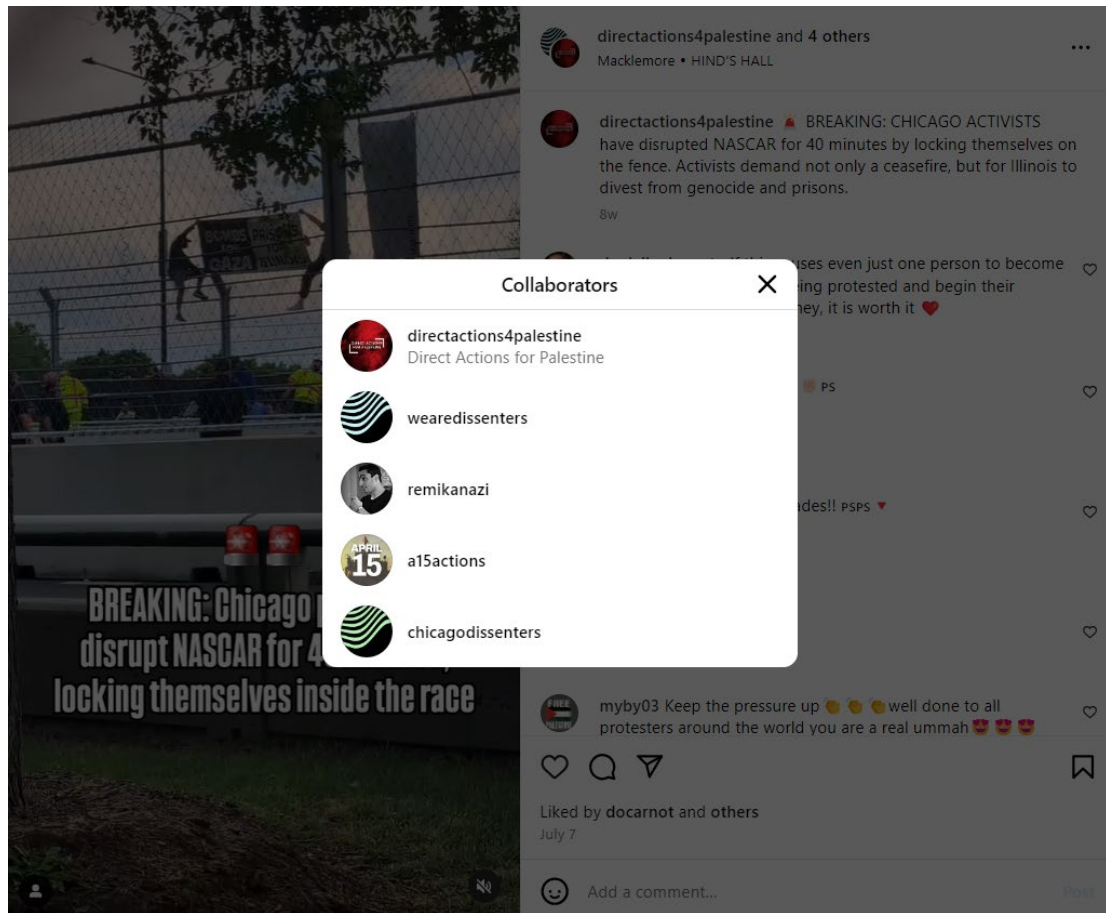




# **EXHIBIT 48**



# **EXHIBIT 49**



# **EXHIBIT 50**



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## WHO WE ARE

USCPR is a political home for all who believe that freedom for the Palestinian people is an integral part of achieving our collective liberation. We provide resources and strategic support to the U.S.-based Palestine solidarity movement, channeling grassroots power into positive change in U.S. policy and public opinion. We work with local organizers and activists, policymakers, movement leaders, media, and advocacy organizations to advance a rights-based, accountability and justice-oriented framework from the U.S. to Palestine.

JOIN US



Take Action

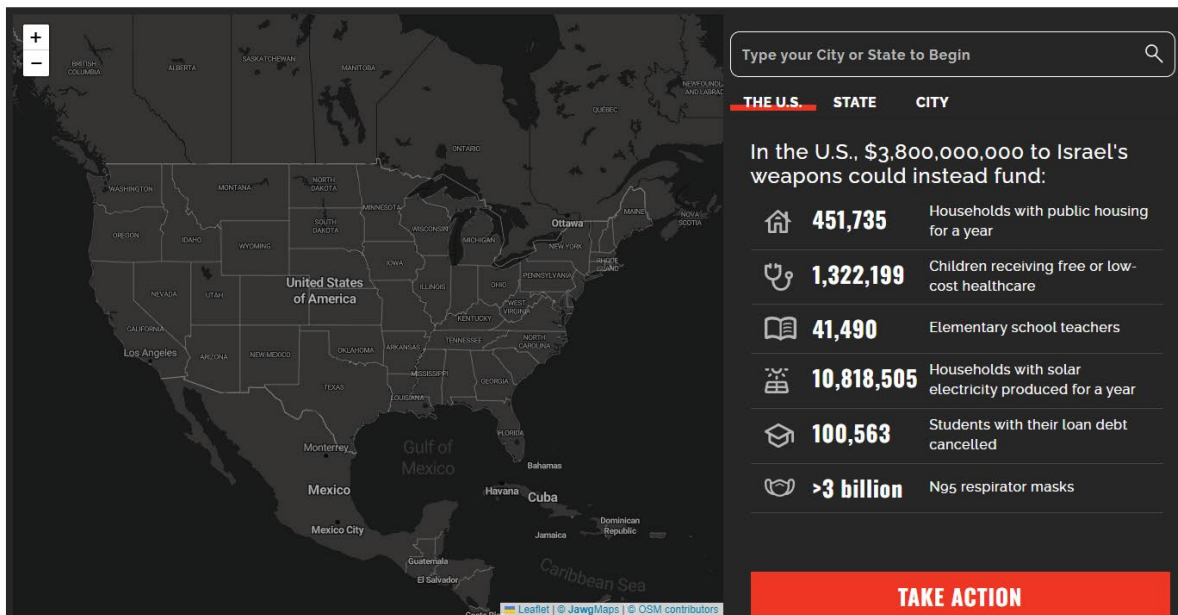


Resources



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# U.S. MILITARY FUNDING TO ISRAEL MAP



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STATEMENT: Biden Should Oppose US Sanctions on ICC

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Your activist toolbox to stop arming Israel

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**GET INVOLVED AND DISCOVER HOW YOU CAN HELP**

[TAKE ACTION](#)

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## OUR IMPACT

**3,200,000+  
PEOPLE REACHED**

About 3.2 million reached through US CPR social media accounts in 2022.

**3,434  
OLIVE SAPLINGS PLANTED**

3,434 olive saplings planted in Palestine in 2021, thanks to 1,134 donors and 20 peer-to-peer fundraisers.

**54,000+  
ADVOCACY MESSAGES**

More than 54,000 advocacy messages sent by 26,900 action takers in 2022.

[LEARN MORE](#)

[DONATE](#) ❤️

## WAYS TO GIVE

[GIVE MONTHLY](#)

[PLANT AN OLIVE TREE](#)

[STOCK GIFTS](#)

[BEQUESTS](#)

[GIVE BY MAIL OR PHONE](#)

[GIVE NOW](#) ➔



### RESOURCES

#### Activist Resources

Boycott, Divestment, and Sanctions  
U.S. Military Funding to Israel Map  
Palestine 101  
Organizing 101  
Grassroots Advocacy Toolkit  
COVID-19 Organizing Toolkit  
Ethical Travel to Palestine  
Speakers and Trainers  
Online Events  
Freedom is the Future

#### Joint Struggles

Indigenous Struggles  
Black Palestine Solidarity  
Colonization and Gentrification  
Myth of Citizenship  
No To All Bans  
Faithwashing & Islamophobia  
Palestine is a Feminist Issue  
Palestine as a Queer Struggle  
Palestine: A Reproductive Justice Issue  
From Palestine to Mexico  
Global Impact of Zionism  
Comprehensive Curriculum

### CAMPAIGNS

#### Current Campaigns

End U.S. Military Funding to Israel  
Greenwashing  
#StandWithThe6  
Demilitarize U.S. to Palestine  
End Medical Apartheid  
#DroptheADL  
Right to Boycott for Justice

#### Historic Campaigns

### NETWORKS

Connect With a Local Group  
Black Christians for Palestine  
Not On Our Dime!  
US CPR Youth Fellows

#### ABOUT US

#### IN THE NEWS

#### WORK WITH US

#### WAYS TO GIVE



**US CAMPAIGN FOR  
PALESTINIAN RIGHTS**

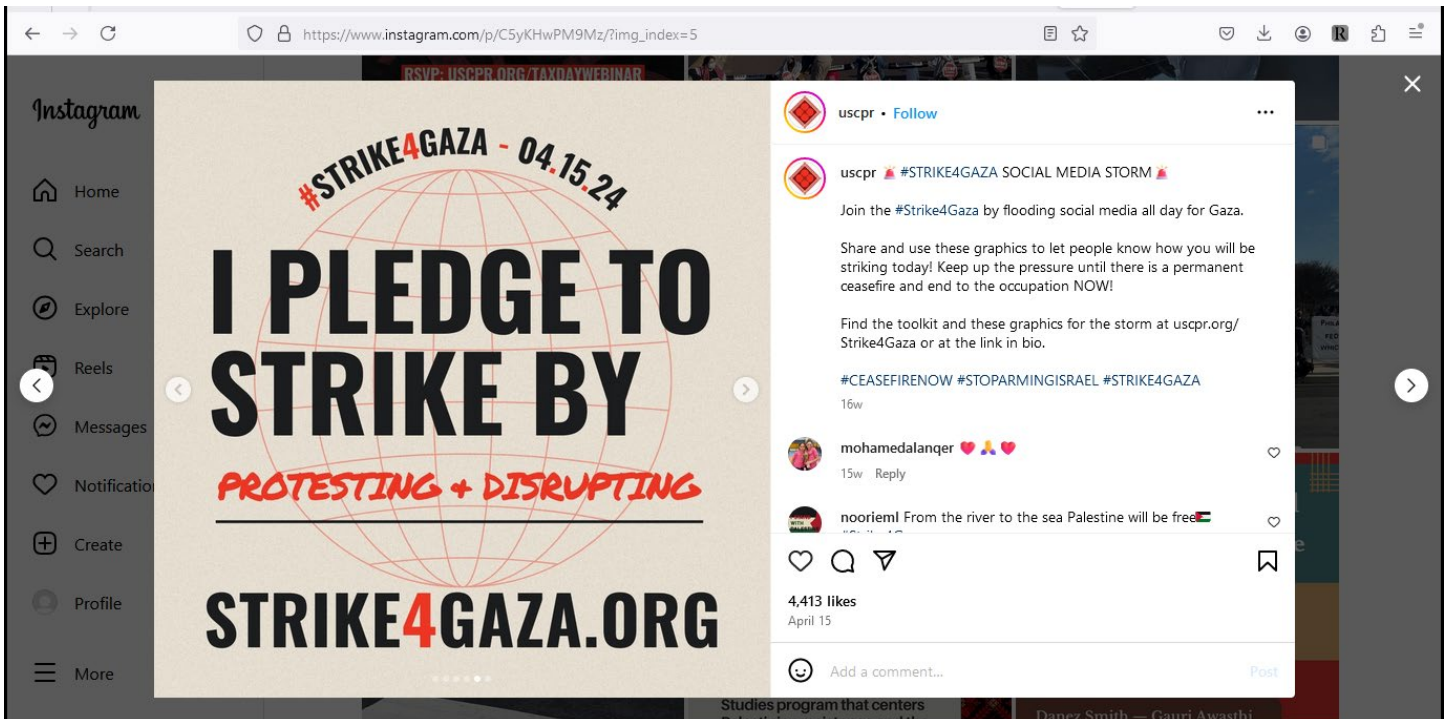
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[TAKE ACTION](#)

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# EXHIBIT 51



# **EXHIBIT 52**

